

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

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

**Claimants**

**and**

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

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

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

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

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

**Defendants**

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**AFFIDAVIT OF PAUL BROWN (COMMUNICATIONS MANAGER AT WOLVERHAMPTON CITY COUNCIL) SWORN 3 APRIL 2024 (EXHIBITING STATEMENT OF PAUL BROWN MADE 2 APRIL 2024)**

**CLAIMANTS' EVIDENCE PURPORTING TO DEMONSTRATE COMPLIANCE WITH ORDERS MADE BY JULIAN KNOWLES J ON 27 FEBRUARY 2024**

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## PB A. 2nd Affidavit of Paul Brown

- |    |   |                  |
|----|---|------------------|
| 1. | Paul Brown Second Affidavit and 19th Witness Statement Sworn 3 April 2024 | PB A 1 - PB A 12 |
| 2. | Paul Brown - PBA19A Cover   | PB A 13          |

## Exhibit Documents

- |     |  |               |
|-----|--|---------------|
| 1.  | Cover Exhibit PB19A  | p 0a          |
| 2.  | Index to Paul Brown Exhibit PB19A.pdf                                    | p 0b          |
| 3.  | 2112561 - EXHIBIT PB19A.docx   | p 1 - p 14    |
| 4.  | 2076162 - Witness Statement Cover Tim Philpot Febraury 2024.docx         | p 15          |
| 5.  | 2076152 - WITNESS STATEMENT OF TIM PHILPOT Feb 2024.signed.docx          | p 16 - p 24   |
| 6.  | Car Cruising - Second Stmt of Mark Wilson - 22-09-23.docx                | p 25 - p 28   |
| 7.  | Exhibit MW1 - Second staement of Mark Wilson - 20-09-23.pdf              | p 29          |
| 8.  | Exhibit PN4 Statement of Mark Wilson Dudley MBC 1 February 2024.pdf      | p 30 - p 33   |
| 9.  | Statement of Nick Hooper 19 January 2023.pdf                             | p 34 - p 52   |
| 10. | 2nd Witness Statement of Nick Hooper.pdf                                 | p 53 - p 58   |
| 11. | Exhibit PN3(1) Witness Statement of Andrew Clarke Sandwell MBC.docx      | p 59 - p 63   |
| 12. | Exhibit PN3(2) - Exhibit AC3 25 Jan 2024.docx                            | p 64 - p 83   |
| 13. | Exhibit PN3(2) - Exhibit AC3 .docx                                       | p 84 - p 103  |
| 14. | 2072227 - PN3(3) 3.1 Jan 2024 Location List - Car Cruising Signage.docx  | p 104 - p 106 |
| 15. | PN3(3) 3.2 .pdf  | p 107         |
| 16. | PN3(3) 3.3 .pdf  | p 108         |
| 17. | PN3(3) 3.4 .pdf  | p 109         |
| 18. | PN3(3) 3.5 .pdf  | p 110         |
| 19. | PN3(3) 3.6 .pdf  | p 111         |
| 20. | PN3(3) 3.7.pdf   | p 112         |
| 21. | PN3(3) 3.8 .pdf  | p 113         |
| 22. | PN3(4) Exhibit AC5 25 Jan 2024.pdf                                       | p 114         |
| 23. | PN5(1) (Walsall MBC) 5 February 2024.docx                                | p 115 - p 121 |
| 24. | PN5(2) Exhibit SJG1.pdf  | p 122         |
| 25. | 2085085 - Pardip Sandhu February statement 6 20 02 24.pdf                | p 123 - p 127 |
| 26. | 2085084 - Exhibit PS4 New Signage in Sandwell February 2024.pdf          | p 128 - p 130 |
| 27. | 2092807 - Certificate of Service A Gale 01 March 2024.pdf                | p 131 - p 132 |
| 28. | 2092809 - Certificate of Service I Iqbal 01 March 2024.pdf               | p 133 - p 134 |
| 29. | 2092815 - Certificate of Service W Szczublińska 01 March 2024.pdf        | p 135 - p 136 |
| 30. | 2092805 - Certificate of Service M Phelps 01 March 2024.pdf              | p 137 - p 138 |
| 31. | 2092811 - Certificate of Service R Richold 01 March 2024.pdf             | p 139 - p 140 |
| 32. | WCC Legal to Solicitors for Mr Gale 01 March 2024 1525 hrs.pdf           | p 141 - p 142 |
| 33. | WCC Legal to Solicitors for Mr Iqbal 01 March 2024 1526 hrs.pdf          | p 143 - p 144 |
| 34. | WCC Legal to Solicitors for Miss Szczublińska 01 March 2024 1524 hrs.pdf | p 145 - p 146 |
| 35. | WCC Legal to Mr Phelps 01 March 2024 1525 hrs.pdf                        | p 147 - p 148 |
| 36. | WCC Legal to Solicitors for Miss Richold 01 March 2024 1525 hrs.pdf      | p 149 - p 150 |

PB A. 2nd Affidavit of Paul Brown

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

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**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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- (9) Ms REBECCA RICHOLD**

**Defendants**

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**SECOND AFFIDAVIT OF PAUL BROWN**

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I, PAUL STEVEN BROWN, of Wolverhampton City Council, St Peter's Square, Wolverhampton, WV1 1RG MAKE OATH and say as follows:

1. Except where indicated to the contrary, the facts in this affidavit are within my knowledge and are true. Where the facts in this affidavit 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 second affidavit in these proceedings. (My first affidavit was filed in relation to the



committal applications against the 5<sup>th</sup> to 7<sup>th</sup> Defendants heard October and November 2023 and detailed various service steps in relation to the interim injunction in force at the time).

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. I was present in court at the hearing of the Black Country Car Cruising/Street Racing Injunction 27 February 2024 and was subsequently provided with a copy of the sealed orders (namely the injunction, power of arrest and directions order) made by the Honourable Mr Justice Julian Knowles at that hearing. The Order of the Honourable Mr Justice Julian Knowles required a series of service steps to be undertaken to effect service of various documents named in the order. I respectfully contend that the four Black Country Claimant Councils, Dudley, Sandwell, Walsall and Wolverhampton dutifully fully complied with the service requirements within the order of the Honourable Mr Justice Julian Knowles dated 27 February 2024.
7. On [DATE] 2024 I made a witness statement in the substantive injunction application (my nineteenth witness statement within these proceedings) in which I detailed the steps the four Claimant Councils had taken to comply with the service requirements stipulated

within the order of the Honourable Mr Justice Julian Knowles dated 27 February 2024. I attach a copy of this statement hereto (my nineteenth statement, together with the exhibit referred to therein ("Exhibit PB19A"), marked as "Exhibit PB3") for ease of reference.

*Paul Moor*  
AFFIRMED  
SWORN AT WOLVERHAMPTON COUNTY COURT  
IN THE COUNTY OF WEST MIDLANDS.  
this 3RD day of APRIL 2024

Before me,

*GREENS*  
an Officer of the Court

OFFICER OF THE COURT  
APPOINTED BY THE JUDGE  
TO TAKE AFFIDAVITS  
PURSUANT TO SECTION 58 OF  
THE COUNTY COURT ACT 1984

B E T W E E N:

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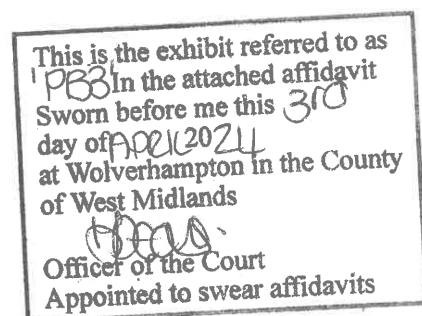
Defendants

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**EXHIBIT PB3**

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This is the document referred to as "EXHIBIT PB3" in the affidavit of Paul Brown sworn  
..... APRIL 2024.



i) Statement of: Paul Brown  
ii) Statement No: 19  
iii) For: Claimants  
iv) Dated: 2.4.2024  
v) Exhibits: PB19A

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
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**Claimants**

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**Defendants**

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**NINETEENTH 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 19th 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 Mr Justice Julian Knowles on 27 February 2024 required the Claimants to complete a series of steps before 16:00 on 15 March 2024 to publicise 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. (a) Issuing a media release highlighting the grant of a Final Injunction and Power of Arrest, such release must provide:
  - (i) Details of the application and summarise the orders made;
  
  - (ii) Any deadline for filing any documents by the Defendants;
  
  - (iii) The date, time and location of any future hearing, if applicable;
  
  - (iv) The addresses of the dedicated webpages maintained by the Claimants regarding car cruising;
  
  - (v) The Claimants' contact details; and
  
  - (vi) 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.

I can confirm that a media release was issued on 28 February 2024. Please see **Exhibit PB19A attached hereto** which includes the "Media release, issued 28 February 2024". There was extensive coverage in the local print and broadcast media; please see "Express & Star, 28 February 2024, Free Radio, 28 February 2024, BBC News, 28 February 2024, BBC News, 29 February 2024, Halesowen News, 29 February, 2024, BNN, 29 February 2024, Local Government Lawyer, 29

February 2024” in **Exhibit PB19A attached hereto**. There was also coverage on BBC WM, Birmingham Live and other outlets.

The media release was also published on the websites of the four claimants. Please see "Media release - City of Wolverhampton Council; Media release – Walsall Council; Media release – Sandwell Council; Media release – Dudley Council" in **Exhibit PB19A attached hereto**.

9. (b) Placing on the Claimants' social media including X (previously known as Twitter), Facebook and Instagram links to the above media release.

I can confirm that social media was posted on the above accounts following the issuing of the media release on 29 February 2024. Please see “X/Twitter”, “Facebook”, “Instagram” in **Exhibit PB19A attached hereto** for a selection of these, including posts shared via West Midlands Police on the Wolverhampton Police, Dudley Police, Sandwell Police and Walsall Police X/Twitter accounts.

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

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

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

[https://www.sandwell.gov.uk/info/200284/roads\\_travel\\_and\\_parking/3231/street\\_racing](https://www.sandwell.gov.uk/info/200284/roads_travel_and_parking/3231/street_racing)

[https://go.walsall.gov.uk/black\\_country\\_car\\_cruising\\_injunction](https://go.walsall.gov.uk/black_country_car_cruising_injunction)

Such pages shall carry a direct link to this Order.

I can confirm that the dedicated street racing pages have been updated as required. See "City of Wolverhampton Council street racing page", "Walsall Council street racing page", "Sandwell Council street racing page" and "Dudley Council street racing page" in **Exhibit PB19A attached hereto**.

11.(d) 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.

I can confirm that each home page contains a link to the street racing webpage. See "City of Wolverhampton Council homepage", "Dudley Council homepage", "Sandwell Council homepage" and "Walsall Council homepage" see in **Exhibit PB19A attached hereto**.

(e) Ensuring that copies of the Injunction and Power of Arrest are available at the front desks of the Claimants' main offices by 12 March 2024.

I can confirm that the above was completed as directed.

(f) Causing 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 Causing 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.

I can confirm that the above has been complied with.

Erecting and 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"; The signage to be activated and in place by 00:01 on 15 March 2024.



Since the Injunction in interim form was granted in December 2022, signage has been erected at various known car cruising hotspots across the four local authority areas of the Claimant Councils in addition to or replacing the signage publicising the previous iteration of the Claimant Councils' car cruising injunction (2015-2021).

This signage comprises large permanent metal signs erected on certain arterial routes throughout the Claimant Councils' combined local authority areas and smaller foamex signs attached to lampposts at car cruising hotspots across the Claimant Councils' combined local authority areas. Additionally, electronic matrix signs along various arterial routes throughout the Claimant Councils' combined local authority areas have been programmed to cycle to display, at regular intervals, messages notifying road users of the existence of the injunction.

The Claimant Councils have also committed to a programme of regular inspections, and maintenance of these metal and foamex signs. Furthermore, the Claimant Councils have publicised points of contact for members of the public to report damaged and missing signs on the dedicated car cruising pages of each of the Claimant Councils' Websites. This evidence regarding the Claimant Councils' signage activity and commitments was presented to the Court at the hearing on 27 February 2024 (the hearing at which the Court determined to grant a final injunction in this matter). Further copies of this evidence appear within **Exhibit PB19A attached hereto** for ease of reference.

- 12.(g) Requesting that the police forces for the West Midlands, Warwickshire, West Mercia, Staffordshire and Leicestershire post on their website and Instagram, X (previously known as Twitter), and Facebook accounts, a link to this Order.

I can confirm that this request was made on 29 January to the above forces and that some have shared messaging on their social channels as a result. Please see "Email to police forces" within **Exhibit PB19A attached hereto**.

The Claimants shall serve this Order on the fifth sixth seventh, eighth and ninth Defendants ('the named Defendants') by email, the named Defendants having

agreed to accept service by this method. Service must be completed by 16:00 on 15 March 2024.

I can confirm that Adam Sheen, Senior Solicitor at the City of Wolverhampton Council, completed service of the named defendants on 1 March 2024. Please see e-mails from Adam Sheen to the Fifth to Ninth Defendants and/or their solicitors to this effect and accompanying certificates of service within **Exhibit PB19A attached hereto**.

8.1. The court may wish to know that the social media posts issued by the City of Wolverhampton Council on X, Facebook and Instagram between 29 February and 20 March 2024 achieved a reach of 31,070, impressions of 35,377 and an engagement rate of 0.5%.

Reach is described by Orlo, the social media 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."

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

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

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 not be captured in the above.

Furthermore, between 28 February and 20 March 2024, the City of Wolverhampton Council's street racing webpage received 114 views, the Walsall Council street racing webpage received 30 views, the Sandwell Council street racing webpage received 96 views and the Dudley Council street racing webpage received 52 views.

The court may also like to know that a sustained programme of communications activity is planned throughout the life of the injunction, including regular messaging to remind people of the existence of the injunction and timely news releases in the event of convictions. This will begin in the coming weeks with a publication of a video featuring footage from street races and full details of the terms of the injunction.

13. 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.

14. 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: 2 April, 2024

This is the exhibit referred to as  
PB19A in the attached affidavit  
Sworn before me this  
day of 3rd 20 APRIL 2024  
at Wolverhampton in the County  
of West Midlands  
*Paul Brown*  
Officer of the Court  
Appointed to swear affidavits

IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION

i) Statement of: Paul Brown  
ii) Statement No: 19  
iii) For: Claimants  
iv) Dated: April 2024  
v) Exhibits: PB19A

CLAIM NO: KB-2022-BHM000188

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

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

**Claimants**

and

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

**Defendants**

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**EXHIBIT PB19A**

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This is the document referred to as "EXHIBIT PB19A" in the nineteenth witness statement of Paul Brown dated April

## Exhibit Documents

i) Statement of: Paul Brown  
ii) Statement No: 19  
iii) For: Claimants  
iv) Dated: 2 April 2024  
v) Exhibits: PB19A

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

**CLAIM NO: KB-2022-BHM000188**

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

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

**Claimants**

**and**

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**Defendants**

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## Exhibit Documents

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3.	2076152 - WITNESS STATEMENT OF TIM PHILPOT Feb 2024.signed.docx	p 16 - p 24
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i) Statement of: Paul Brown  
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This is the document referred to as "EXHIBIT PB19A" in the nineteenth witness statement of Paul Brown dated April 2024.



## High Court grants full injunction to ban street racing in region

Released: Wednesday 28 February, 2024



The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', in the Black Country.

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.

Unlike the interim injunction which has been in place since 2022, the full injunction also covers organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

The 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.

Granting the final injunction at the High Court in Birmingham yesterday (Tuesday 27 February, 2024), Mr Justice Julian Knowles said: "Car cruising is a euphemism; it's organised dangerous driving and there have sadly been injuries and fatalities."

PC Mark Campbell, from the Operation Hercules team, West Midlands Police's tactical response to street racing in the West Midlands, described the injunction as "highly valuable and a tried and tested means of prevention and resolution", without which "there will be a serious collision in which people are very likely to be seriously injured or killed."

He told the court: "It is only a matter of time before the high-speed driving involved in organised races leads to another multiple fatality incident – this may be the driver of the vehicle, an innocent member of the public or any number of spectators actively taking part in the street cruising meet."

He said that he has witnessed "400-plus" vehicles at street cruises in locations like the Black Country Route in Bilston or Manor Way, Halesowen, and that the "potential for a very serious collision is massive" because of the speeds involved. When police are called, "the street cruisers drive off in a chaotic manner, over central reservations, along footpaths, sometimes travelling the wrong way down a dual carriageway into oncoming vehicles", and that is it "only a matter of time this will result in a fatal collision".

He also highlighted the police resources needed to deal with street racing, which are "therefore not providing policing to other parts of the community." In addition, traffic, police dogs, drone teams and helicopters are often required to intervene and add support, at huge cost to taxpayers.

He added: "The price paid by communities is incalculable. They are exposed to a high level of harm, noise, intimidation, disruption and threats. I have personally spoken to members of the public who are at their wits ends. One was assaulted after approaching a group of street cruisers performing stunts, one even had suicidal thoughts of the constant noise and intimidation."

The court was shown video footage of street racing meets in the Black Country and elsewhere, including an event in Stevenage, Hertfordshire, on 18 July 2019 in which a serious collision occurred at a street racing event, resulting in one person suffering life-changing injuries and 16 others being injured. Two drivers involved were convicted of dangerous driving and PC Campbell said: "The fact that no one was killed was purely down to luck".

Mr Justice Julian Knowles said the videos "show cars racing at high speed, organised dangerous driving, with spectators watching, filming, encouraging. Spectators are putting themselves at very considerable danger."

Team Leader for Wolverhampton Anti-Social Behaviour Team Pardip Nagra, who presented evidence including statements from councillors, MPs, residents and businesses across the Black Country, told the court: "I believe it is vital that we have an injunction in place across the Black Country to enable West Midlands Police and the four councils to continue to tackle the dangerous and anti-social activity of car cruising.

"There is overwhelming support from local residents and businesses who, prior to the previous injunction being in place, had all suffered for many years and who are concerned that, without an injunction, the scale of the car cruising issue will return to the levels experienced previously."

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. Speaking for the claimants, Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Adults and Wellbeing, said: "We are delighted that the High Court has seen fit to grant this full and final injunction which will help us continue to tackle the menace of street racing in the Black Country.

"The wealth of evidence presented to the court makes it clear the impact this anti-social, irresponsible and highly dangerous behaviour has had on people across our region, and the tragic incidents both locally and nationally which have caused serious injuries and even fatalities, and I would like to thank everyone who has shared their experiences so candidly."

For more information about the injunction, please visit the street racing pages of the applicants – Wolverhampton ([www.wolverhampton.gov.uk/street-racing-injunction](http://www.wolverhampton.gov.uk/street-racing-injunction)), Walsall, ([https://go.walsall.gov.uk/black\\_country\\_car\\_cruising\\_injunction](https://go.walsall.gov.uk/black_country_car_cruising_injunction)), Sandwell ([www.sandwell.gov.uk/streetracing](http://www.sandwell.gov.uk/streetracing)), or Dudley ([www.dudley.gov.uk/car-cruising-injunction](http://www.dudley.gov.uk/car-cruising-injunction)) – which are in the process of being updated.

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

The injunction and power of arrest will remain in force for a period of at least three years, and will be subject to an annual review. It will come into force in the coming days, once the claimants have completed certain service provisions. In the meantime, the interim injunction and power of arrest remain in force.

To contact the claimants, write to: FAO: Black Country Car Cruise, Legal Services, City of Wolverhampton Council, Civic Centre, St Peter's Square, Wolverhampton WV1 1RG. Alternatively, email [litigation@wolverhampton.gov.uk](mailto:litigation@wolverhampton.gov.uk) or call 01902 556556.

**ENDS**

Media release, issued 28 February 2024

## Car cruising in the Black Country formally banned after High Court ruling

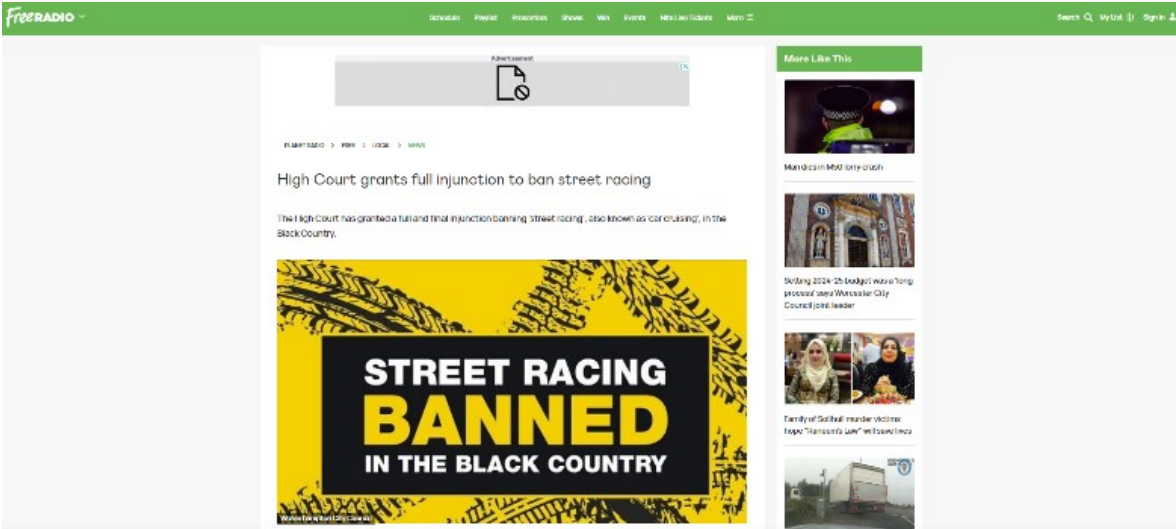
Car cruising and street racing in the Black Country has been banned after the High Court issued a full and final injunction.

By **Paul Jenkins** | Published Feb 28 | Last updated Feb 28 | 2 Comments



Delight: Councillor Jasbir Jaspal who has campaigned on behalf of the City of Wolverhampton Council on the issue of car cruising in the Black Country

Express & Star, 28 February 2024



Free Radio, 28 February 2024

## Councils granted street cruising ban amid crackdown



Police and councils say the ban is vital to keep people safe

**Josh Sandford**  
BBC News, West Midlands

28 February 2024

**A ban on street racing across Birmingham and the Black Country has been granted by judges.**

A full three-year injunction is now in place for five local authorities until 27 February 2027.

The order prohibits drivers, riders or passengers participating in racing - also known as street cruising - anywhere in Birmingham, Wolverhampton, Dudley, Sandwell and Walsall.

A number of arrests have been made under temporary injunctions, and earlier this month a senior police officer said a permanent ban would save lives.

BBC News, 28 February 2024

## Residents plagued by '400 cars' before race ban



GETTY IMAGES

A police officer said he had witnessed dangerous driving at the events

**Josh Sandford**  
BBC News, West Midlands

29 February 2024

**Residents were plagued by street-racing meets of up to 400 cars before a ban on the practice, according to a police officer.**

PC Mark Campbell said he witnessed a huge number of vehicles at "cruises" in locations across the Black Country.

Motorists had been seen driving erratically near the Black Country Route in Bilston, Wolverhampton, and Manor Way in Halesowen.

A ban on street racing across Birmingham and the Black Country was granted by judges this week, giving officers extra powers to crack down on drivers, riders and passengers.

BBC News, 29 February 2024



# High Court ruling bans street racing in the Black Country

29th February

COURT CRIME



High Court ruling bans street racing across the Black Country (Image: Getty Images)



By **Bev Holder**  
Chief Reporter  
[@StourbridgeNews](#)

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**2 Comments**

THE High Court has granted a full and final injunction banning street racing, also known as car cruising, across the Black Country.

Halesowen News, 29 February, 2024

BNN, 29 February 2024

FEATURED EVENTS



Section 16 Claims of Discrimination  
Arising from Disability  
13 03 2024  
Online (live)



The Regulator of Social Housing  
Consumer Standards & self-referral process  
26 03 2024  
Online (live)

**PublicLawJobs** LocalGovernmentLawyer  
**PublicLawToday**

### West Midlands authorities secure final injunctions against car cruising

February 29, 2024

Post
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A High Court judge has granted local authorities in the West Midlands full and final injunctions banning 'street racing', also known as 'street racing'.

One injunction was obtained by the 'Black Country' boroughs of Wolverhampton, Dudley, Sandwell and Walsall, covering the whole of their areas, while the other was secured by Birmingham City Council.

At a hearing at the High Court in Birmingham earlier this week (27 February, 2024), Mr Justice Julian Knowles said: "Car cruising is a

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Fully updated and providing analysis of the revised guidance from the Anti-Social Behaviour, Crime and Policing Act 2014, the book includes case studies, practical examples, template documents and tactical advice



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Local Government Lawyer, 29 February 2024

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High Court grants full injunction to ban street racing in region

HOME / NEWS / HIGH COURT GRANTS FULL INJUNCTION TO BAN STREET RACING IN REGION

The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', in the Black Country.

It 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.

Unlike the interim injunction which has been in place since 2022, the full injunction also covers organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

The 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



*The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', in the Black Country*

Media release - City of Wolverhampton Council

# High Court grants full injunction to ban street racing in region

Published on 28 February 2024

[Print](#)

The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', in the Black Country.



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Good



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Bad



It prohibits people from participating, as a driver, a rider or a passenger, in a

Media release – Walsall Council

## High Court grants full injunction to ban street racing in region

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Unlike the interim injunction which has been in place since 2022, the full injunction also covers organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

The 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.

Granting the final injunction at the High Court in Birmingham yesterday (Tuesday 27 February, 2024), Mr

Media release – Sandwell Council



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29 FEB 2024

PR street and green care H community safety

## High Court grants full injunction to ban street racing in region

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Media release – Dudley Council

### X/Twitter

**Wolves Council**  
@WolvesCouncil

The High Court has granted a full and final injunction banning street racing (aka car cruising) in the Black Country. Full story [wolverhampton.gov.uk/news/high-court...](https://wolverhampton.gov.uk/news/high-court...) @WalsallCouncil @sandwellcouncil @dudleymbc @WMPolice (1/5)



**Walsall Council**  
@WalsallCouncil

The High Court has granted a full and final injunction banning street racing in the Black Country! 🚫🏎️

Read more on our newsroom: [go.walsall.gov.uk/newsroom/high-...](https://go.walsall.gov.uk/newsroom/high-...)

@WolvesCouncil @sandwellcouncil @dudleymbc

**Sandwell Police** reposted

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Sandwell Council reposted  
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**Wolverhampton Today**  
 Published by Orlo · 21h · 🌐

The High Court has granted a full and final injunction banning street racing (aka car cruising) in the Black Country. 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 jail, a fine, or an order to have their assets seized.



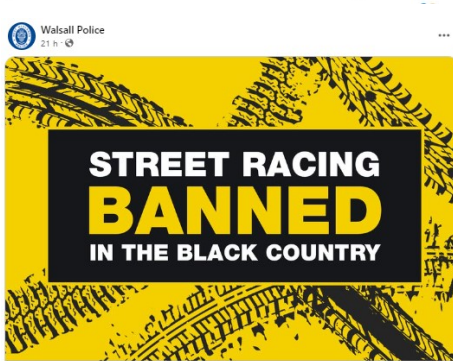
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**Wolverhampton Today**  
 Published by Orlo · 22h · 🌐

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**Wolverhampton Today**  
 Published by Orlo · 28 February at 15:01 · 🌐

The High Court has granted a full and final injunction banning street racing (aka car cruising) in the Black Country. 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 jail, a fine, or an order to have their assets seized.

**Instagram**



Wolverhampton, today The High Court has granted a full and final injunction banning street racing (also known as 'car cruising') in the Black Country. 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 jail a fine or an order to have their assets seized.

The new injunction prohibits people from participating (as a driver, rider, passenger or spectator) in, or from promoting, organising or publicising, 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 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. Speaking on behalf of the claimants' Councils earlier today, the City of Wolverhampton Council's Cabinet Member for Adults and Wellbeing, said: "We are delighted that the High Court has seen fit to grant this full and final injunction which will help us continue to tackle the nuisance of street racing in the Black Country.

"The wealth of evidence presented to the court makes it clear the impact this anti-social, irresponsible and highly dangerous behaviour has had on people across our region, and the tragic incidents both locally and nationally which have caused serious injury and even fatalities, and would like to thank everyone who has shared their experiences so candidly."

For more information about the injunction please visit the website of the applicant councils. Incidents of street racing

[View insights](#) [Boost post](#)



Wolverhampton The High Court has granted a full and final injunction banning street racing (also known as 'car cruising') in the Black Country. 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 jail a fine or an order to have their assets seized.

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"The wealth of evidence presented to the court makes it clear the impact this anti-social, irresponsible and highly dangerous behaviour has had on people across our region, and the tragic incidents both locally and nationally which have caused serious injury and even fatalities, and would like to thank everyone who has shared their experiences so candidly."

For more information about the injunction please visit the website of the applicant councils. Incidents of street racing should be reported on 01902 555555 or by contacting West Midlands Police on 101. In an emergency always dial 999.

4 likes  
07 hours ago

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**CITY OF WOLVERHAMPTON COUNCIL**

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---

High Court grants order banning street racing in the Black Country

HOME / PARKING AND ROADS / HIGH COURT GRANTS ORDER BANNING STREET RACING IN THE BLACK COUNTRY

The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', 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.



It also covers organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

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- Street racing injunction review hearing next week >
- High Court continues interim Black Country street racing ban >
- Street racers could face jail for breaching court injunction >

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City of Wolverhampton Council street racing page



# Black Country street racing injunction

## Overview

The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', in the Black Country.

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

## What the 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.

It also covers organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

The injunction covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and 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

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Walsall Council street racing page

## High Court grants full injunction to ban street racing in region

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The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', in the Black Country.

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.

Unlike the interim injunction which has been in place since 2022, the full injunction also covers organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

The 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.



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Sandwell Council street racing page

# Car cruising injunction

## Injunction bans street racing in the Black Country

The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', 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.

It also covers organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

The injunction covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and 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.

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

## Dudley Council street racing page

	<a href="#">Accessibility</a>	<a href="#">Facebook</a>
<a href="#">Information</a>	<a href="#">Customer feedback</a>	<a href="#">YouTube</a>
	<a href="#">Our website</a>	<a href="#">Twitter</a>
	<a href="#">Street Racing Injunction</a>	<a href="#">Flickr</a>

## City of Wolverhampton Council homepage

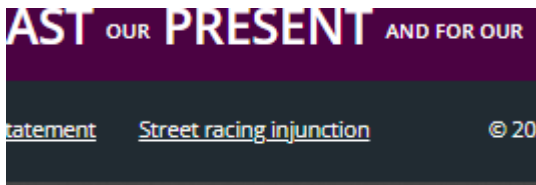
[Modern Slavery](#)      [Car Cruising Ban - High Court](#)



## Dudley Council homepage

<a href="#">Modern Slavery</a>	<a href="#">Street Racing</a>	<a href="#">Translate this site</a>	<a href="#">Site</a>
--------------------------------	-------------------------------	-------------------------------------	----------------------

## Sandwell Council homepage



## Walsall Council homepage

RE: Street racing injunction in Black Country



Paul Brown

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

Retention Policy 2 Year Retention Policy (2 years)

Expires: 29/02/2026



Thu 29/02/2024 09:57

Hi all

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

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

<https://twitter.com/WolvesCouncil/status/1762855772248043630>

[https://www.facebook.com/WolverhamptonToday/posts/pfbid0VRf3bKtcYzpxPUkskthLHSGXZAzQK6S34RFDWA19QcNwdYDA2XpHRSmjH13nrIMSf?locale=en\\_GB](https://www.facebook.com/WolverhamptonToday/posts/pfbid0VRf3bKtcYzpxPUkskthLHSGXZAzQK6S34RFDWA19QcNwdYDA2XpHRSmjH13nrIMSf?locale=en_GB)

<https://www.instagram.com/p/C35T1bidwq?hl=en>

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

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

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

- (g) Requesting that the police forces for the West Midlands, Warwickshire, West Mercia, Staffordshire and Leicestershire post on their website and Instagram, X (previously known as Twitter), and Facebook accounts, a link this Order.

## Email to police forces

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

**Claim No. KB-BHM-2022-000188**

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

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

**Claimants**

**-and-**

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

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

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

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

**5. Mr ANTHONY PAUL GALE**

**6. Miss WIKTORIA SCZCUBLINSKA**

**7. Mr ISA IQBAL**

**8. Mr MASON PHELPS**

**Defendants**

---

**WITNESS STATEMENT OF TIM PHILPOT**

---

I, TIM PHILPOT of CITY OF WOLVERHAMPTON COUNCIL, CIVIC CENTRE, ST PETERS SQUARE, WOLVERHAMPTON, WV1 1SH, WILL SAY AS FOLLOWS:

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief.
2. This statement is given to update the Court on replacement and additional signs in relation to the Injunction and street racing which have been ordered and installed, or which are planned to be installed within the City of Wolverhampton.
3. Signs have been designed and produced in both metal and Foamex material. A document showing the design of the signs is attached to this statement and marked as TP1.
4. A total of 15 locations, detailed below were identified for the installation of signage in 2023. 10 of these are adjacent to the Black Country Route and require the larger metal signs. 5 are in streets giving access to the Black Country Route where the smaller Foamex signs are suitable.

Metal Signs

- Black Country Route near Vulcan Road Roundabout near Bilston Town Football Club (Lamppost 151)
- Black Country Route Vulcan Road Island near Greenhous Volkswagen Van Centre (Lamppost 152)

- Black Country Route near to Lunt Road/Vulcan Road Junction (Lamppost 169)
- Black Country Route westbound near Lunt Junction parallel to Darlaston Brook (Lamppost 200)
- Black Country Route parallel to McDonalds Off Coseley Road Island (freestanding)
- Black Country Route parallel to Nice 1 Limited Off Coseley Road Island Lamppost 062
- Black Country Route Oxford St Roundabout near Brook Street (Lamppost 128)
- Black Country Route eastbound near Overfield Drive (Lamppost 17)
- Black Country Route north side of roundabout junction with Black Country New Road
- Black Country Route on westbound carriageway approaching roundabout junction with Black Country New Road

#### Foamex signs

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

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

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

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

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



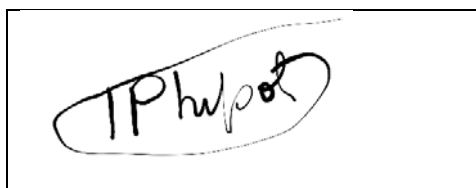
Two Foamex signs were installed in error on the Black Country Route. These are not effective in this location being too small to be read at speed. As there is a larger metal sign on this section of road, these Foamex signs will not be maintained or replaced.

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

Statement of Truth

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

Signed



Date

09/02/2024

**Print name in full** Tim Philpot

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

Appendix TP1

Sign Designs



1) at 75 xht  
 1525 x 1700 mm  
 area: 2.592 sq.m

Metal Sign



FACING	
Background:	YELLOW
Border size (mm):	7.5
Border colour:	BLACK
TEXT	
Style:	Transport Heavy
Colour:	/black
Lowercase (x-height) (mm):	20
Capital height (mm):	28
DIMENSION	
Width (mm):	400
Height (mm):	500
Area (sq.m):	0.2
Tolerance +	5mm
	0

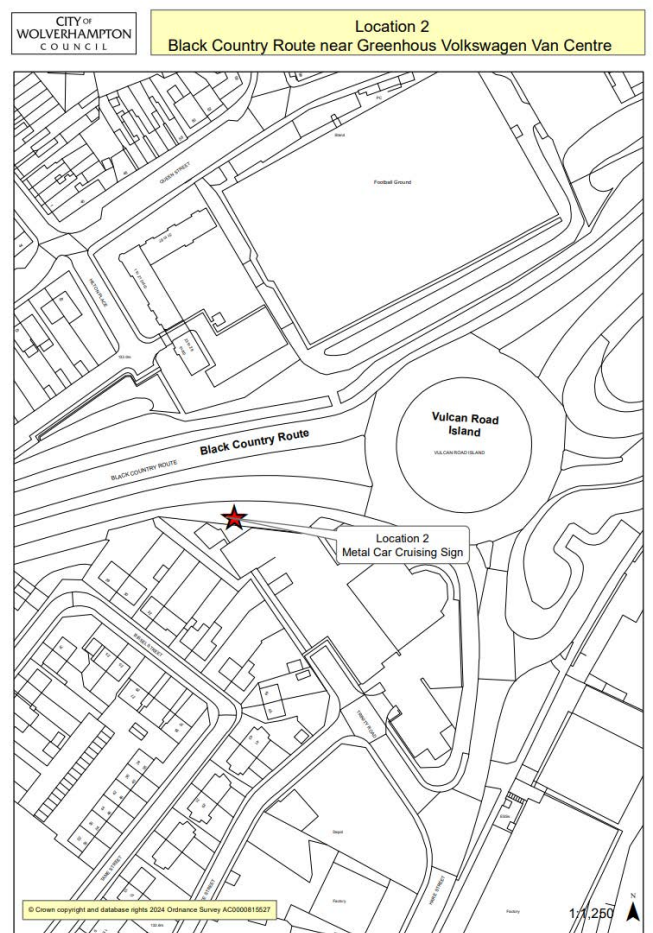
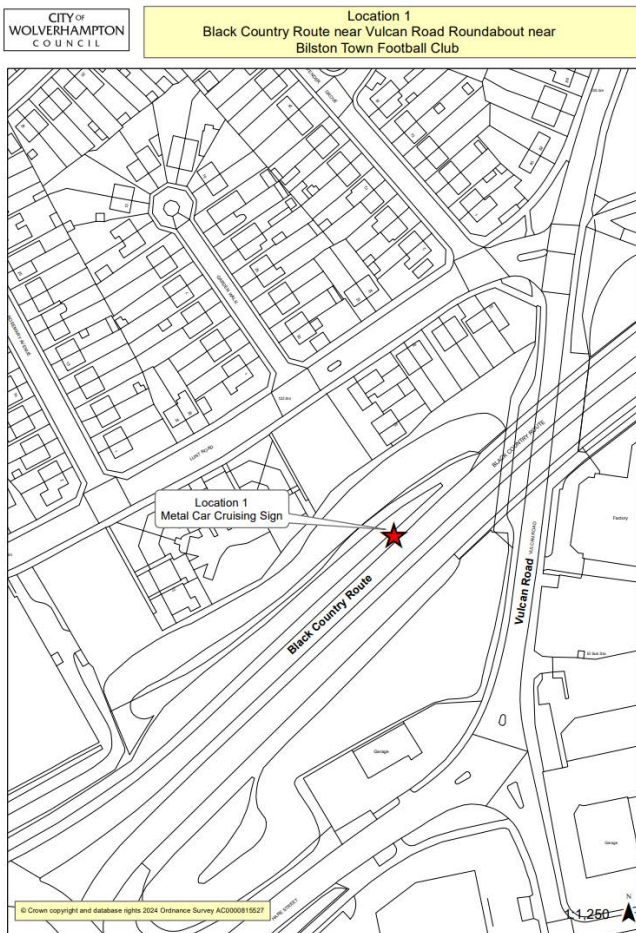
Foamex Sign

# Car Cruising & Street Racing Injunction 2024

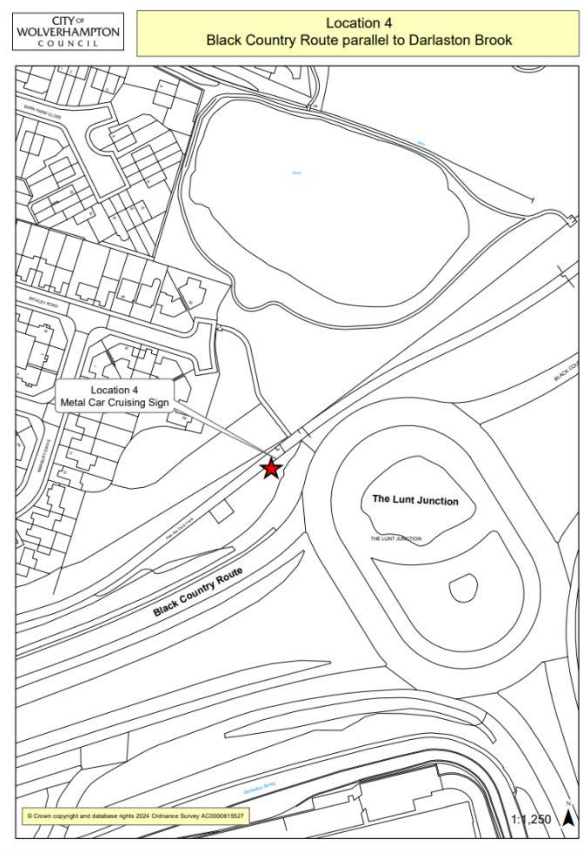
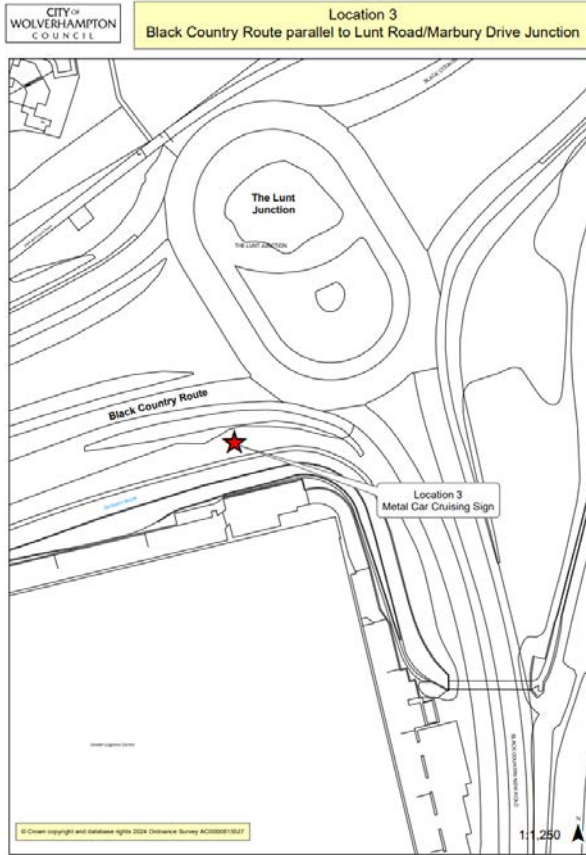
## Witness Statement (Wolverhampton)

### Appendix TP2

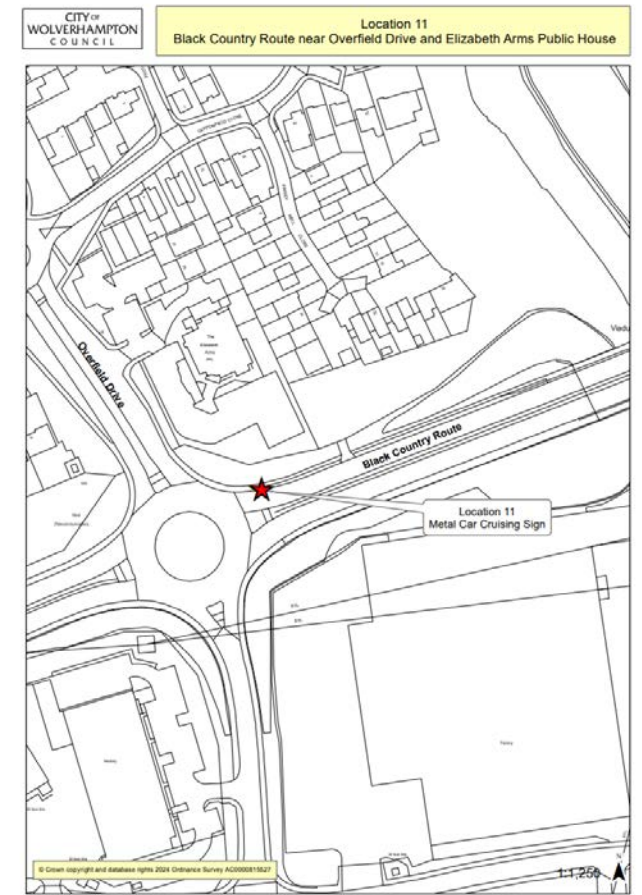
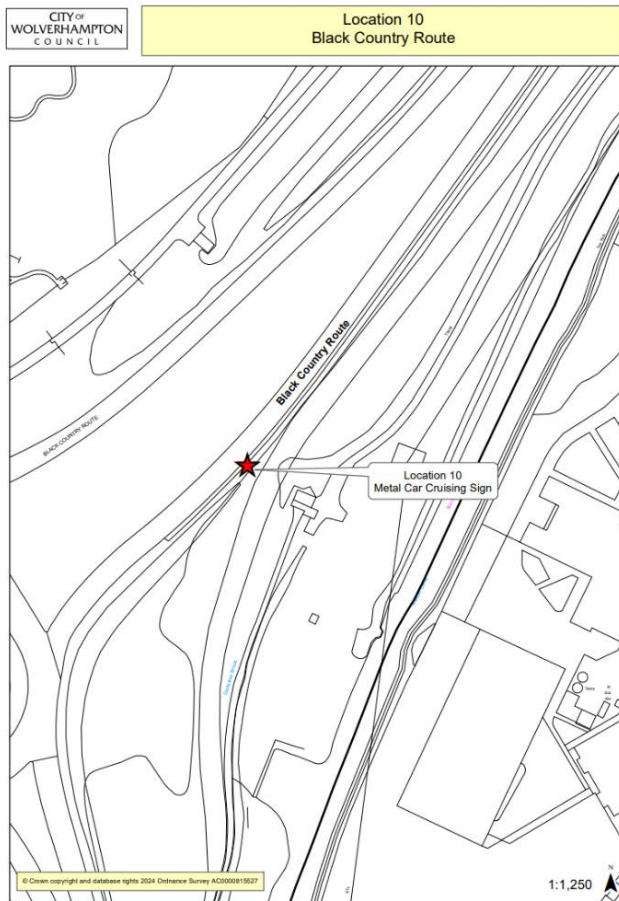
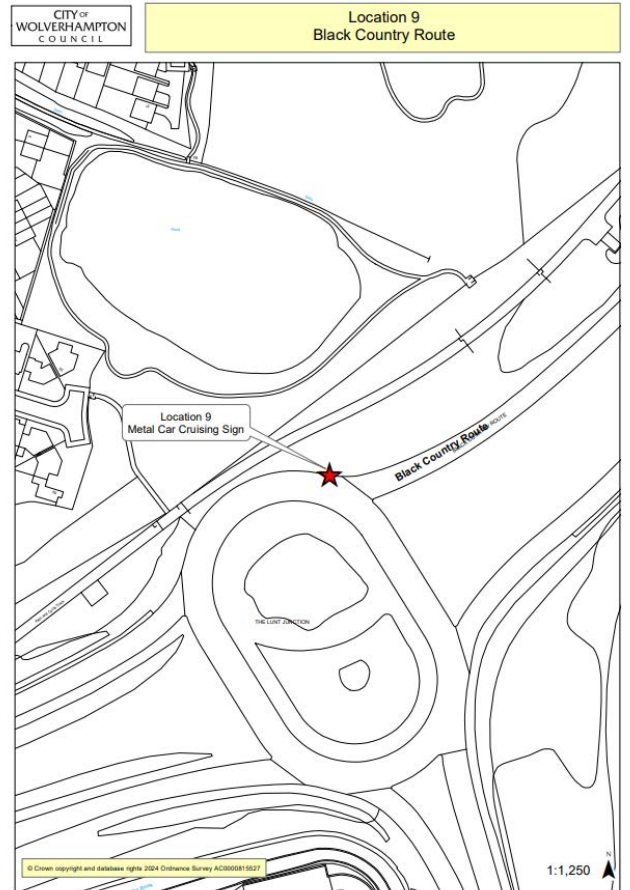
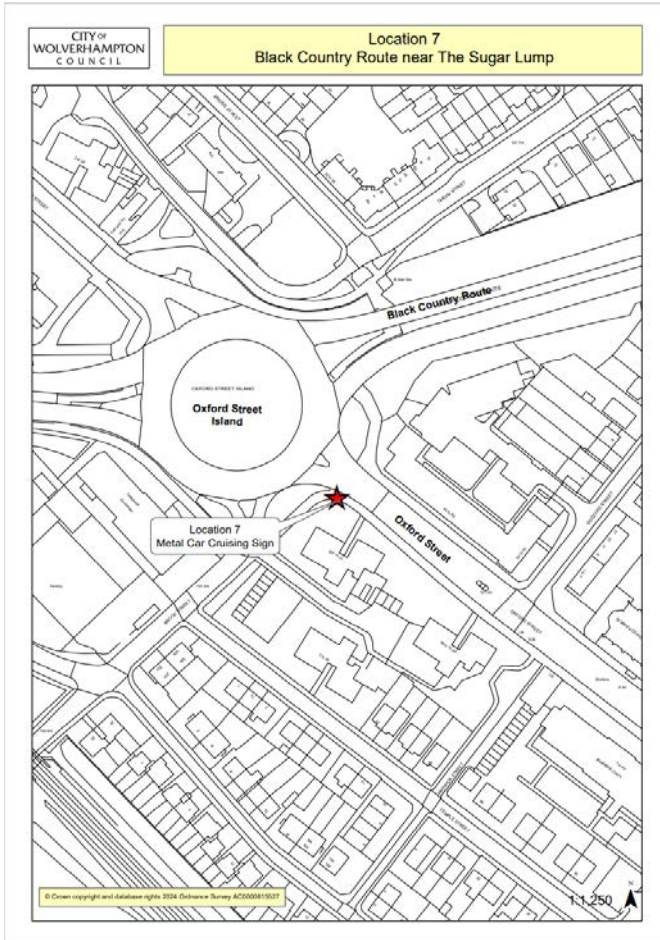
### Sign Locations

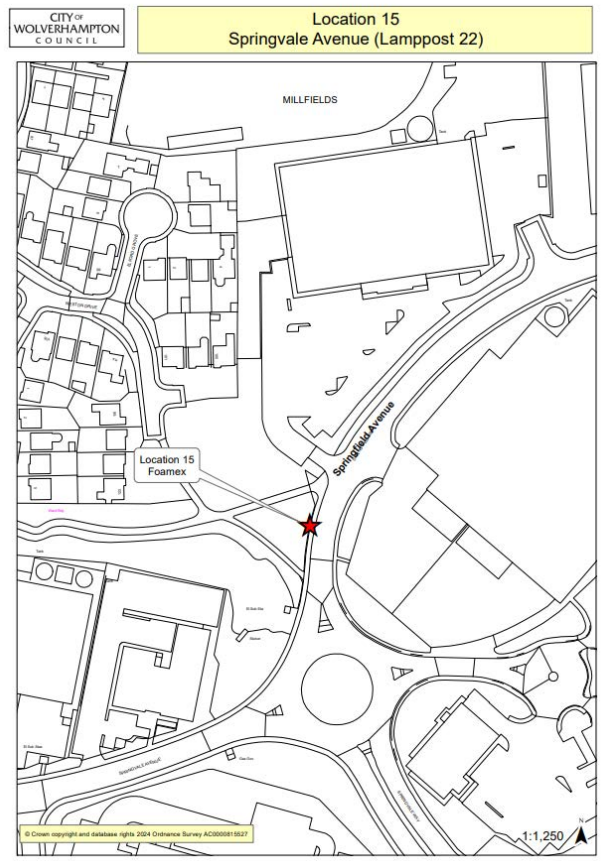
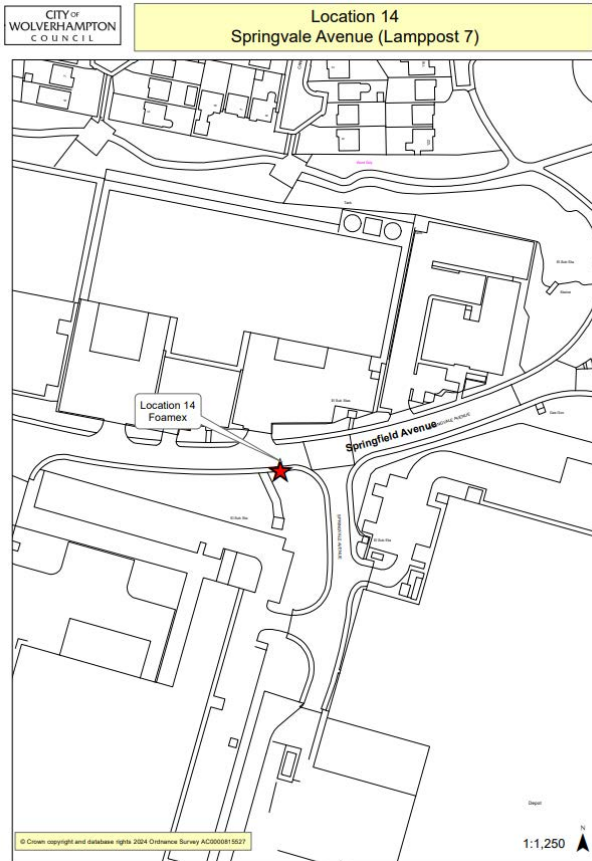
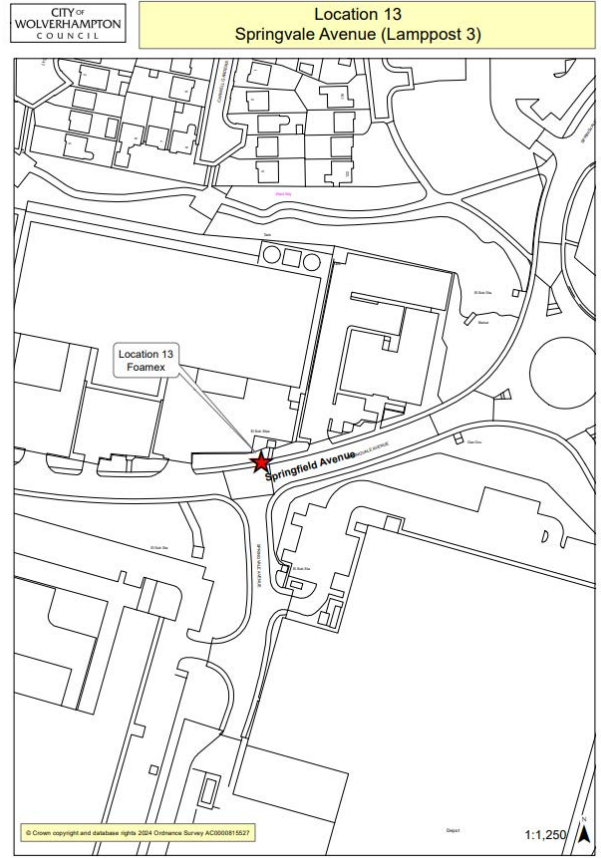
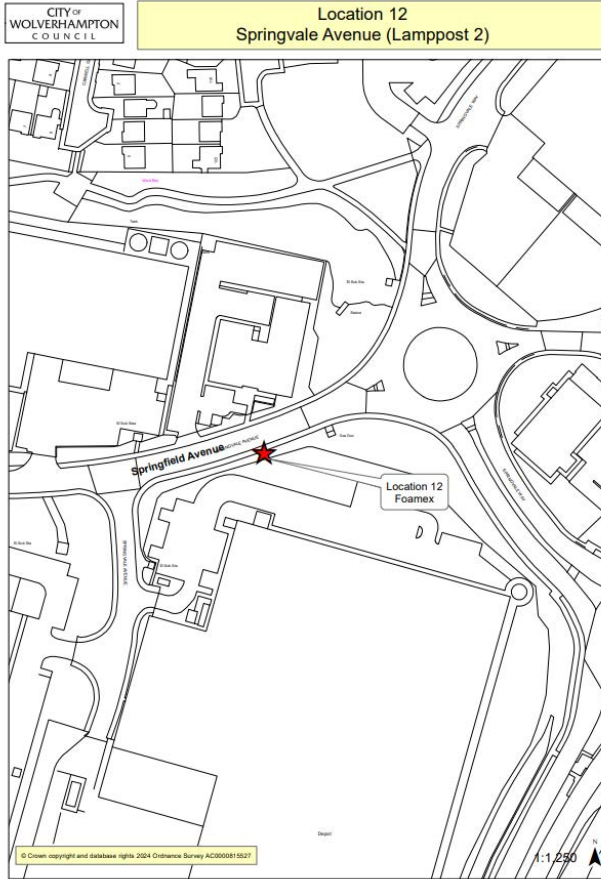




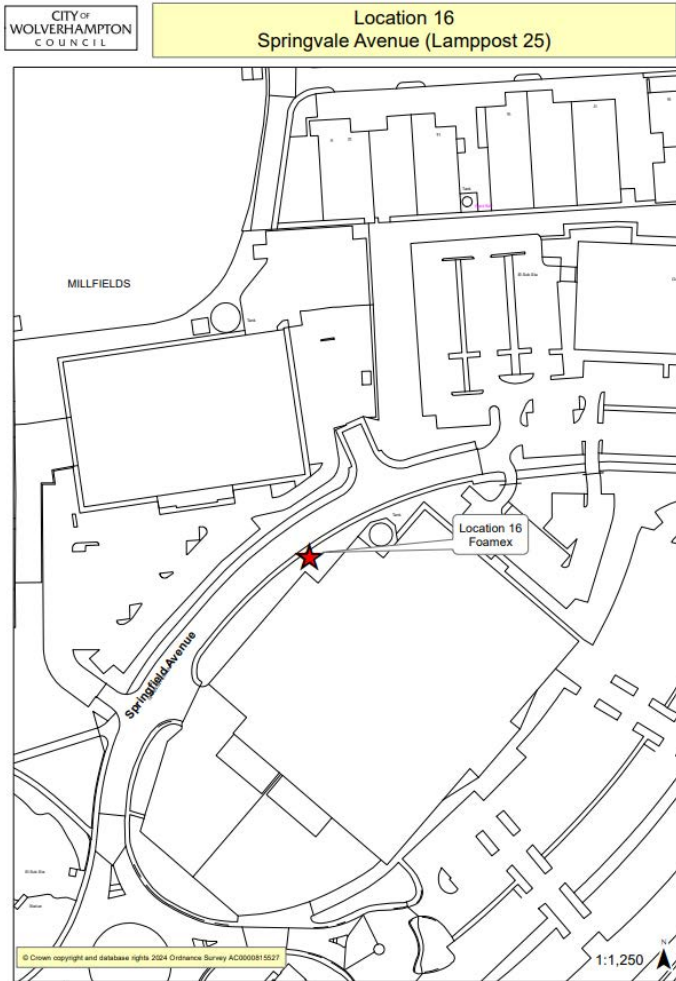












Statement filed on behalf of: Dudley MBC  
Statement of: Mark Wilson  
Statement No: 2  
Dated:  
Exhibits: "MW1"  
Filed:

**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 25<sup>th</sup> 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 9<sup>th</sup> 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 22<sup>nd</sup> December 2022, complaints of street racing continue to be received in respect of Manor Way, Halesowen and these have increased during the recent summer months. We are also aware that there continues to be regular 'meet-up's' of groups in car parks across the borough to do 'donut' stunts and speed around the enclosed area. A 'donut' is a manoeuvre performed while driving a vehicle, which entails rotating the rear or front of the vehicle around the opposite set of wheels in a continuous motion, creating a circular skid-mark pattern of rubber on a carriageway and possibly even causing the tires to emit smoke from friction. This has happened in several locations (Waterfront and Showcase Cinema for example); largely at night but there have been such gatherings in the early evenings too.
  
6. I have witnessed footage on social media of car cruising across the black country and I have seen footage of cars congregating on Manor way in an unsafe way around the shell petrol station.
  
7. I believe that the injunction has had a positive effect and continues to be a necessary tool to ensure the public safety and protection of law abiding members of the public and businesses who have suffered for many years from the negative impact of car cruising and street racing. However, as sought, the terms of the injunction demonstrably need widening.

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

Name of Claimant: Dudley Metropolitan Borough Council

Signed  Date: 22/09/2023

Print Name in Full : .....MARK WILSON .....



For: Claimants  
Statement of: Mark Wilson  
Statement no: 4  
Exhibits:  
Date: 1<sup>st</sup> February 2024

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

**CLAIM NO: KB-2022-BHM-000188**

**BETWEEN:**

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

**Claimants**

**-and-**

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

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

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

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

**Defendants**

---

**FOURTH WITNESS STATEMENT OF MARK WILSON**

---

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

1. I am employed by Dudley Metropolitan Borough Council as a Community Safety Officer. As the Borough's lead for Anti-Social Behaviour, Car Cruising, Public Space Protection Orders, Prevent and Hate Crime, part of my role is to ensure that Dudley is a safe place to live, work and visit and to work collaboratively across the West Midlands region in respect of community safety issues.
2. I make this statement supplemental to the witness statements which I signed on 25<sup>th</sup> April 2023, 20<sup>th</sup> September 2023 and 30<sup>th</sup> November 2023.
3. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief.
4. This statement is given to update the Court on car cruising activities and the condition of the signage in the Dudley Borough relation to the Injunction and street racing.
5. Since my previous witness statement Manor Way continues to be a hotspot for car cruise activity with regular reports of vehicles gathering at Shell Petrol station and racing along the dual carriageway. There have also been sporadic complaints of cars and motorbikes racing at the Merry Hill Centre.


6. I can confirm that all the signage in the Dudley Borough relating to the Injunction and street racing has recently been inspected by our Transport and Highways team and they report that all are in good condition with no visible damage.
7. A schedule for monthly inspections is now in place with the next inspection of the signage being due to take place on 26<sup>th</sup> February 2024.
8. Damaged signage can be reported to our call centre, Dudley Council Plus, by telephone on 0300 555 2345 or email at [DudleyCouncilPlus@dudley.gov.uk](mailto:DudleyCouncilPlus@dudley.gov.uk). Any reports will be forwarded to a member of the Transport and Highway Services team who will arrange to inspect and repair/replace the signs where required.
9. I believe that the injunction continues to have a positive effect and it is important that it remains in place and a final order made to ensure the public safety and protect law abiding members of the public and businesses who have suffered for many years from the negative impact of car cruising and street racing. However, as sought the terms of the order demonstrably need widening to include spectators and organisers.
10. I believe the facts stated in this statement to be true. I understand that proceedings for contempt may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.



Statement of Truth

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

**Signed**



**Date**

01/02/2024

**Print name in full** Mark Wilson

For: Claimants  
Statement of:  
Statement no: 1  
Exhibits:  
Date: 19th January  
2023

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

**CLAIM, NO: KB-2022-BHM-000188**

**BETWEEN:**

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

**Claimants**

**-and-**

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

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

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

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

**Defendants**

---

**WITNESS STATEMENT OF NICK HOOPER**

---

I, NICK HOOPER, Maintenance Manager of Dudley Metropolitan Borough Council, Lister Road Depot, Dudley, DY2 8JW, WILL SAY AS FOLLOWS:

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief.
2. This statement is given to update the Court on replacement and additional signs in relation to the Injunction and street racing which have been ordered and installed, or which are planned to be installed within the Dudley Borough.
3. Signs have been designed and produced in both metal and Foamex material. A document showing the design of the metal signs is attached to this statement and marked as **NH1**. A further document, showing the design of the Foamex signs is attached to this statement and marked as **NH2**.
4. A total of 12 metal signs and 36 Foamex signs have been ordered for installation at various sites in the Borough. The metal signs were received in Lister Road Depot on 17<sup>th</sup> January 2023.
5. Of the 12 metal signs, 5 of these have been ordered to replace existing signage (which is now out of date.) These signs are allocated to be fitted in the following locations, with a photograph of each location being attached to this statement and marked with the indicated exhibit number as follows:
  - Duncan Edwards Way sited between Points 63 and 64 (E:394107 N:289287) **NH3**
  - Duncan Edwards Way sited between Points 108 and 107 (E:394962 N:290346) **NH4**
  - Birmingham New Road (A4123) **NH5**
  - Birmingham Road (A461) **NH6**


- Hagley Road (A456) **NH7**
6. The replacement signs referred to above were installed on 18<sup>th</sup> January 2023.
  7. In addition to the replacement signs, the remaining 7 metal signs are intended to be installed as follows :
    - 3 signs to be installed on Manor Way (A456)
    - 4 signs to be installed at the entrance ways to the Waterfront, Merry Hill.
  8. The metal signs at the entrances to the Waterfront were installed on 19<sup>th</sup> January 2023 as follows (a photograph is exhibited of the new sign in each location as indicated)
    - Merry Hill site 1- Entrance to Hop House **NH8**
    - Merry Hill site 2- Entrance to Waterfront East **NH9**
    - Merry Hill site 3- Between Point 21 &22 **NH10**
    - Merry Hill site 4- Off Island to Construction College **NH11**
  9. The signs ordered for Manor Way (A456) are proposed to be sited as follows, with the intention that they should be attached to the rear of existing directional signs (a photograph of the intended site of installation is exhibited as indicated)
    - 1 sign to be sited on the Westbound approach to Grange Road Roundabout **NH12**
    - 1 sign to the Eastbound approach to Grange Road Roundabout **NH13**
    - 1 sign to be sited on M5 Junction 3 exit onto Manor Way **NH14**
  10. The metal signs for Manor Way have been ordered and will be collected on Wednesday 25<sup>th</sup> January 2023, with installation scheduled for Thursday 26<sup>th</sup> January 2023.
  11. There has been an issue with delivery of the 36 Foamex signs. These are scheduled to be collected on 25<sup>th</sup> January 2023. The 6 signs which are intended for installation at Cross Street/Stafford Street Car Park are anticipated to be installed on Friday 27<sup>th</sup> January 2023.

12. New Mill Street/Minorities and Flood Street Car Parks are currently in use as sites or compounds for the Midlands Metro Alliance and are therefore no longer public car parks under the control of Dudley Metropolitan Borough Council.
  
13. The remaining 30 Foamex signs are intended for installation at sites at Merry Hill Centre. These will be provided to Merry Hill Centre for installation as soon as possible after collection on 25<sup>th</sup> January 2023. A document showing the proposed locations of the signs is attached to this statement and marked as **NH15**.

Statement of Truth

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

Signed



Date

19.01.23

**Print name in full** NICHOLAS HOOPER

PLEASE TAKE TIME TO CHECK THE DRAWING AND ADVISE OF ANY CHANGES REQUIRED PRIOR TO APPROVAL.

NH1

FACING

Background: YELLOW  
 Border size (mm): varies  
 Border colour: BLACK

TEXT

Style: Transport Heavy

Colour: BLACK  
 Lowercase(x,height (mm)): 75/80  
 Capital height (mm): 105/112

DIMENSION

Width (mm): as detailed  
 Height (mm): as detailed  
 Area (sq.m): as detailed  
 Tolerance: + 5mm  
 1

Drawn by: MR

Date: 05/01/2023

Approved for manufacture

Company.....

Sign.....

MR 50



1) at 75 xht  
 1525 x 1700 mm  
 area: 2.592 sq.m



2) at 80 xht  
 1645 x 1800 mm  
 area: 2.961 sq.m

PLEASE CHECK AND CONFIRM ALL DETAIL, MATERIAL AND SIZING BEFORE MANUFACTURE COMMENCES

COMMENTS

PLEASE TAKE TIME TO CHECK THE DRAWING AND ADVISE OF ANY CHANGES REQUIRED PRIOR TO APPROVAL.

- NH2



FACING

Background:  
YELLOW  
Border size (mm):  
7.5  
Border colour:  
BLACK

TEXT

Style:  
Transport Heavy  
  
Colour:  
/black  
Lowercase(x,height (mm)):  
20  
Capital height (mm):  
28

DIMENSION

Width (mm): 400  
Height (mm): 500  
Area (sq.m): 0.2  
Tolerance: + 5mm  
0

Drawn by: MR

Date: 05/01/2023

Approved for manufacture

Company.....

Sign.....

MR 0

PLEASE CHECK AND CONFIRM ALL DETAIL, MATERIAL AND SIZING BEFORE MANUFACTURE COMMENCES



NH3



NH4





NH5



NH6



Google



NH7



# NH8





NH9



# NH10



NH11





NH12





A456  
Halesowen, England  
Google  
Street View - Oct 2022

NH13



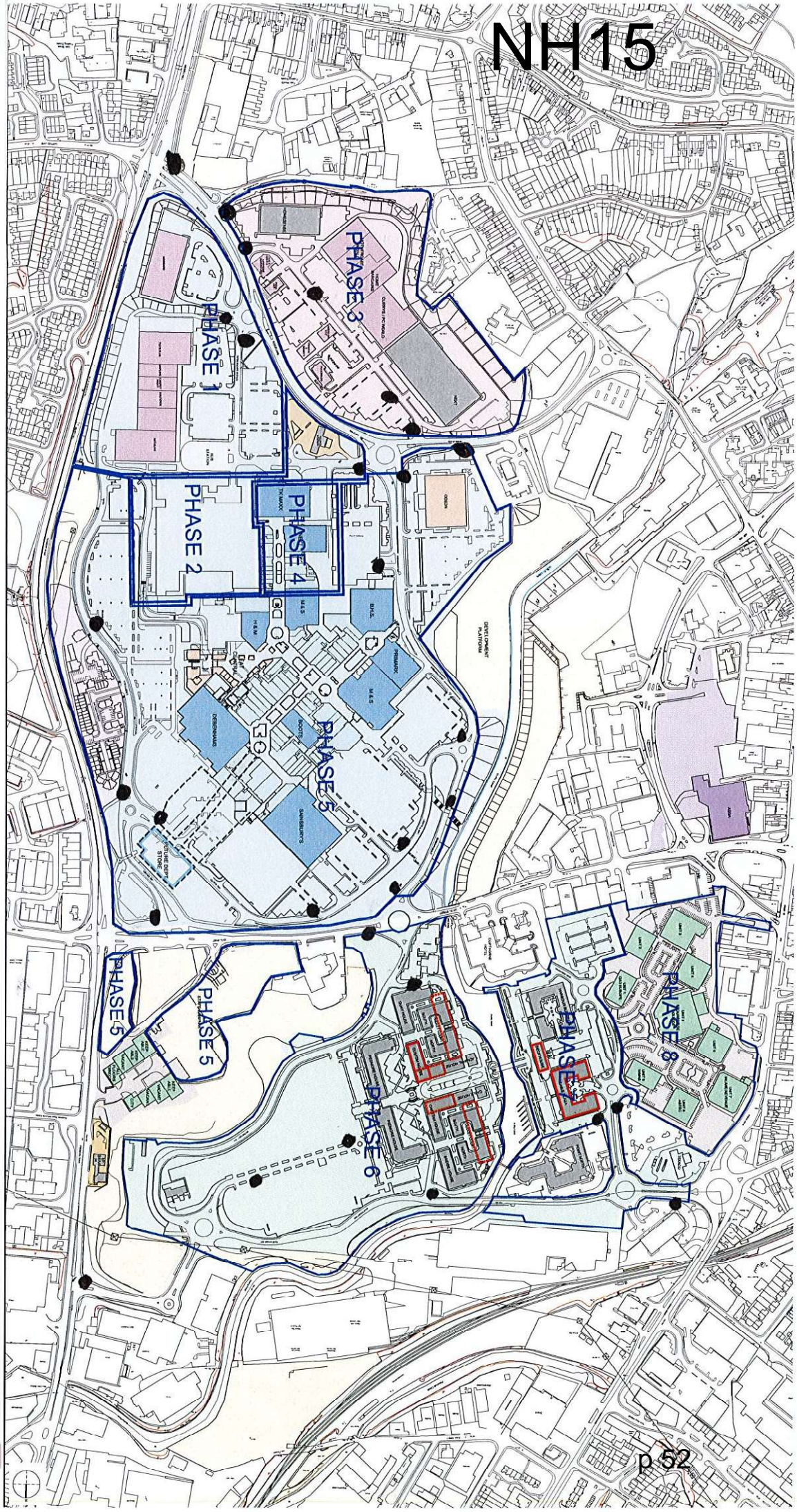
Google

Image capture: Oct 2022 © 2023 Google United Kingdom Terms

NH14









For: Claimants  
Statement of:  
Statement no: 1  
Exhibits:  
Date: 19th January  
2023

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

**CLAIM NO: KB-2022-BHM-000188**

**BETWEEN:**

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

**Claimants**

**-and-**

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

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

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

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

**Defendants**

---

**SECOND WITNESS STATEMENT OF NICK HOOPER**

---

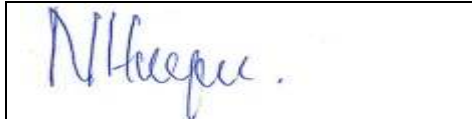
I, NICK HOOPER, Maintenance Manager of Dudley Metropolitan Borough Council, Lister Road Depot, Dudley, DY2 8JW, WILL SAY AS FOLLOWS:

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 supplemental to the witness statement which I signed on 19<sup>th</sup> January 2023.
3. This statement is given to update the Court on replacement and additional signs in relation to the Injunction and street racing which have been installed since my last statement.
4. The metal signs on Manor Way (A456) were installed on 26<sup>th</sup> January 2023 as follows (a photograph is exhibited of the new sign in each location as indicated)
  - A456 Manor Way – M5 Junction exit 3 **NH16**
  - A456 Manor Way – East bound approach to Grange Road Roundabout **NH17**
  - A456 Manor Way – West Bound to Grange Road Roundabout **NH18**
5. Foamex signs have also now been installed at Stafford Street car park and Cross Street car park.
6. The remaining 30 Foamex signs have been provided to Merry Hill staff for installation at sites around the Merry Hill Centre as soon as possible.

Statement of Truth

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

**Signed**



**Date**

01.02.23

**Print name in full** Nick Hooper











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

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

**CLAIM NO: KB-2022-BHM-000188**

**BETWEEN:**

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

**Claimants**

**-and-**

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

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

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

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

**Defendants**

---

**WITNESS STATEMENT OF ANDREW CLARKE**

---

I, Andrew Clarke, ASB Town Lead of Sandwell Metropolitan Borough Council, Sandwell Council House, Freeth Street, Oldbury, B69 3DE, WILL SAY AS FOLLOWS:

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief.
2. I write this statement in relation to the Street Racing / Car Cruising Injunction granted at the High Court on the 21<sup>st</sup> December 2022, and in response to their directions in this matter.
3. This is my second statement in these proceedings.
4. Confirmation of all signage locations in Sandwell, was one of the steps set out in terms of one of the requirements set out at Court.
5. Having undertaken an inspection on the morning of 17<sup>th</sup> January 2024, I can confirm that signage is currently displayed at the following locations:
6. A temporary sign is displayed at Retail Park Entrance of Axeltree Way (J9 towards Wednesbury), WS10 9QY.
7. A temporary sign is displayed at Axeltree Way Junction (near to Curry's PC World), WS10 9QY
8. A temporary sign is displayed at Axeltree Way Island (near to Burger King), WS10 9QY
9. A temporary sign is displayed at MoorCroft Drive at its junction with Hallens Drive, WS10 7DD
10. A temporary sign is displayed at Hallens Drive Island, at its junction with Patent Drive, WS10 7XB

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


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

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

Statement of Truth

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

Signed



Date

25/01/2024

**Print name in full** Andrew Clarke

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

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

**CLAIM NO: KB-2022-BHM-000188**

**BETWEEN:**

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

**Claimants**

**-and-**

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

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

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

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

**Defendants**

---

**EXHIBIT AC3**

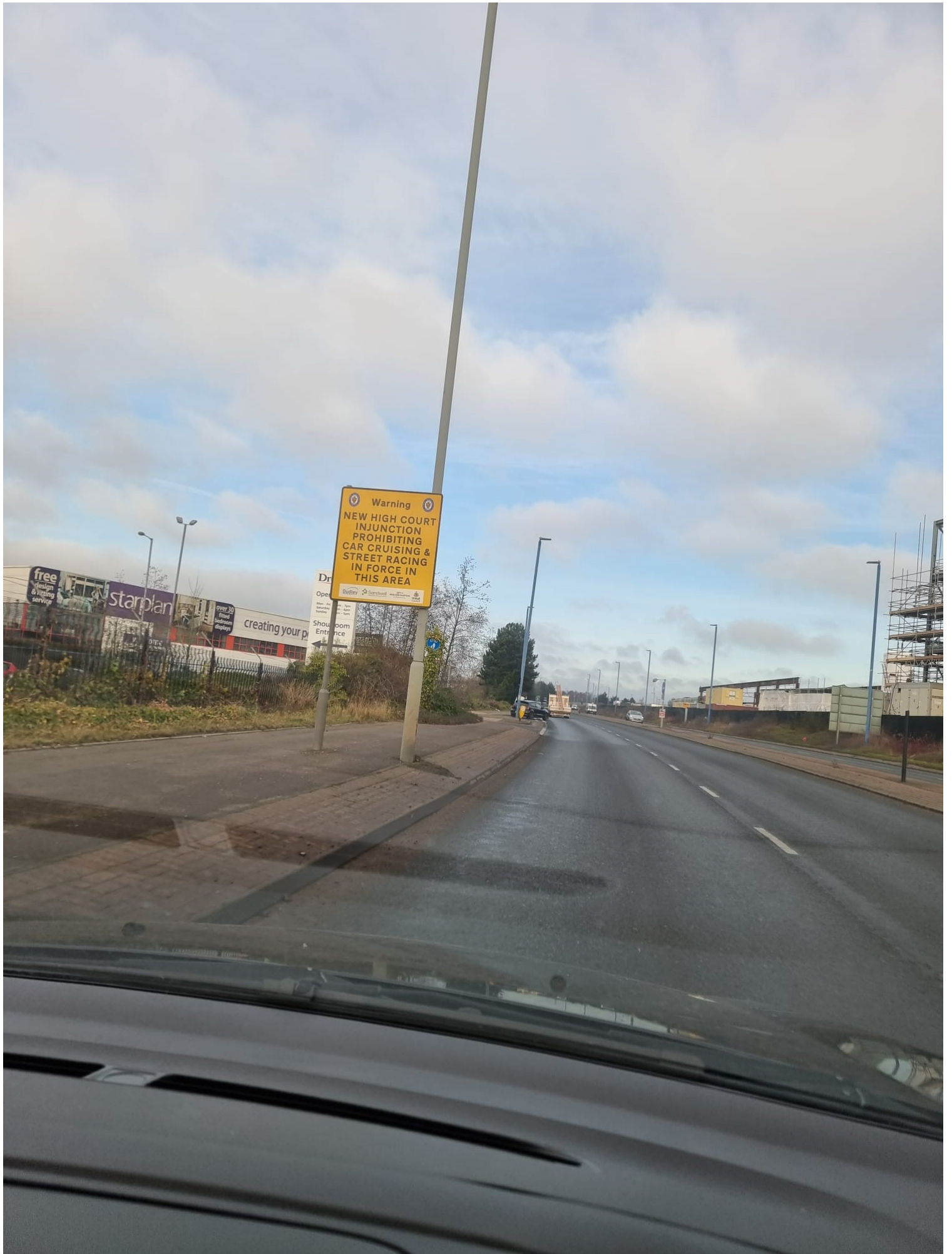
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This is the document referred to as “Exhibit AC3” in the witness statement of Andrew Clarke dated  
25 January 2024















(M6, M5)

Walsall (A461)

Dudley (A461)  
Wednesbury

Great Bridge (A41)

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

Dudley Borough Council







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





















































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

Dudley Sandwell CITY OF WOLVERHAMPTON  
Metropolitan Council





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

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

**CLAIM NO: KB-2022-BHM-000188**

**BETWEEN:**

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

**Claimants**

**-and-**

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

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

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

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

**Defendants**

---

**EXHIBIT AC3**

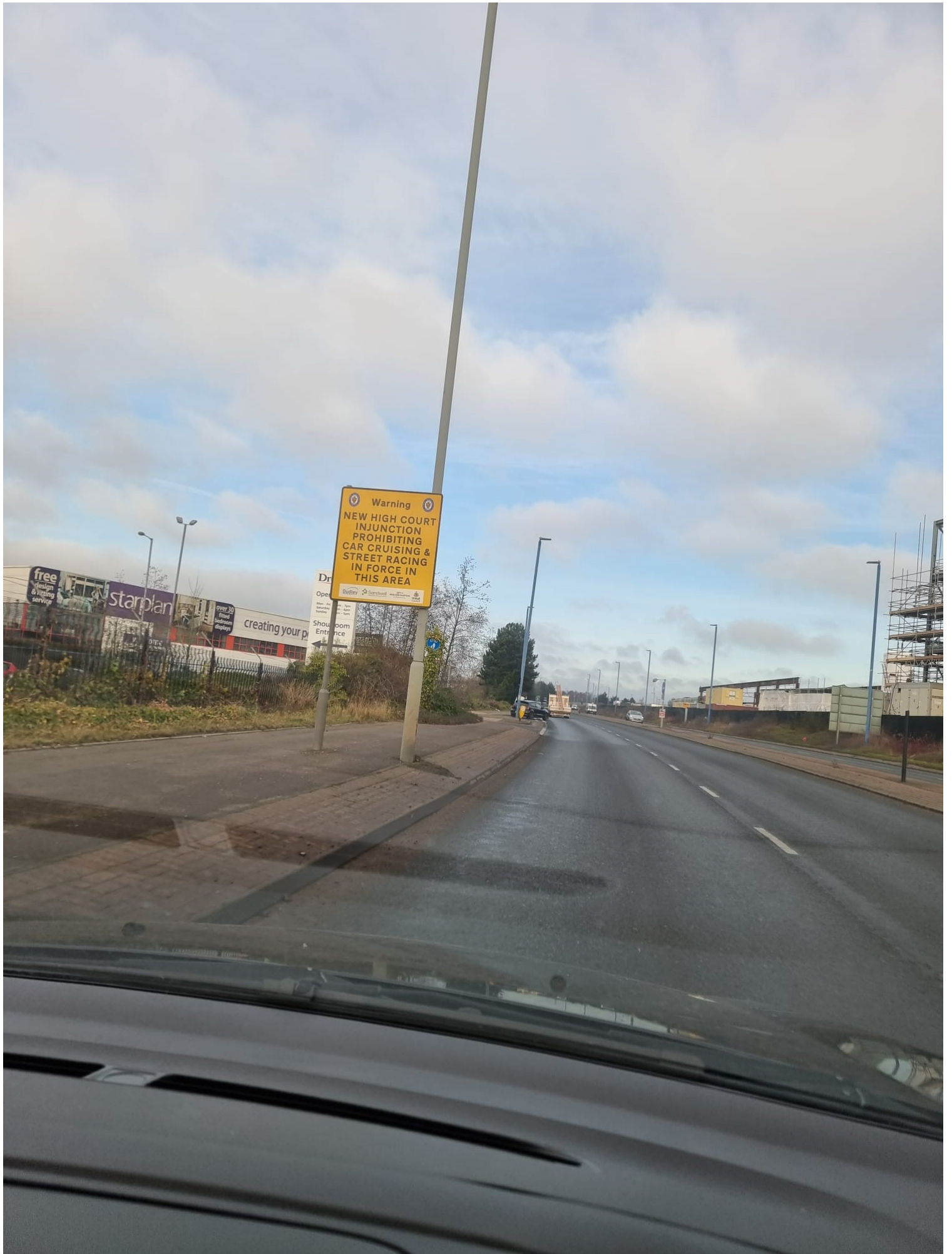
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This is the document referred to as “Exhibit AC3” in the witness statement of Andrew Clarke dated 25 January 2024















(M6, M5)

Walsall (A461)

Dudley (A461)  
Wednesbury

Great Bridge (A41)

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

Dudley Borough Council







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





























































## **SANDWELL'S CAR CRUISING SIGN LOCATIONS**

### **Wednesbury**

#### **Location 1**

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

Large Permanent sign

#### **Location 2**

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

Foamex Sign

#### **Location 3**

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

Foamex Sign

#### **Location 4**

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

Foamex Sign

#### **Location 5**

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

Foamex Sign

#### **Location 6**

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

Foamex Sign

#### **Location 7**

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

Foamex Sign

#### **Location 8**

A41 (Black Country Route near to Dreams)

Large permanent sign

### **Tipton**

#### **Location 9**

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

Foamex Sign

**Location 10**

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

Foamex Sign

**Location 11**

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

Foamex Sign

**Location 12**

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

Foamex Sign

**Location 13**

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

Foamex Sign

## **West Bromwich**

**Location 14**

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

Foamex Sign

**Location 15**

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

Foamex Sign

**Location 16**

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

Foamex Sign

**Location 17**

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

Foamex Sign

## **Oldbury**

**Location 18**



Toys R Us car park entrance, attached to lighting column

Foamex Sign

**Location 19**

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

Foamex Sign

**Location 20**

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

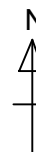
Foamex Sign

**Location 21**

Junction 2, M5, at the junction with Birchley Island

Large permanent sign

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



# LOCATION PLAN

## Axletree Way Wednesbury

Location 2  
Foamex Car  
Cruising sign

B & Q

Location 3  
Foamex Car  
Cruising sign

Burger King

Location 4  
Foamex Car  
Cruising sign

Pizza Hut

KFC

JUNCTION 9, M6



Location 1  
Large Metal  
type sign



HIGHWAYS GROUP MANAGER

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

PROJECT  
Car Cruising  
Signage

LOCATION  
Wednesbury

DRAWING TITLE  
Car Cruising  
Signage

SCALE Not to Scale

ISSUED BY S Chadwick

DATE 17th Jan 2023

DRAWN BY Sharon Lang

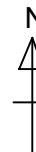
DRAWING No 40972 S/4



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

# LOCATION PLAN

## Hallen Drive / Patent Drive Wednesbury



Location 6  
Foamex Car Cruising sign

Location 5  
Foamex Car Cruising sign

Location 7  
Foamex Car Cruising sign



Location 8  
Large Metal type sign



**HIGHWAYS GROUP MANAGER**

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

**PROJECT**  
Car Cruising Signage

**LOCATION**  
Wednesbury

**DRAWING TITLE**  
Car Cruising Signage

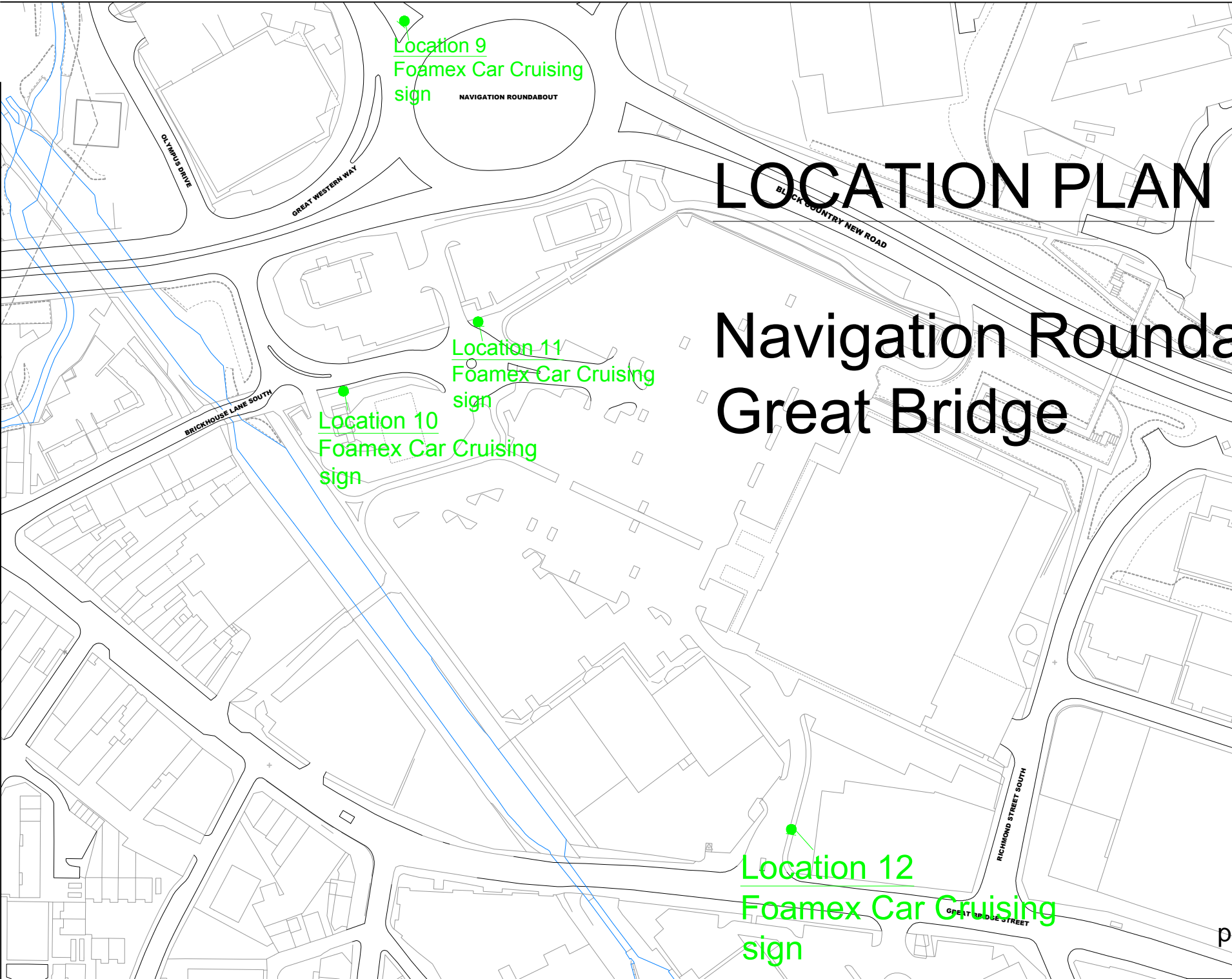
SCALE: Not to Scale

ISSUED BY: S Chadwick

DATE: 17th Jan 2023

DRAWN BY: Sharon Lang

DRAWING No: 40972 /1 S/4



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

# LOCATION PLAN

## Navigation Roundabout Great Bridge



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

**PROJECT**  
 Car Cruising  
 Signage

**LOCATION**  
 Great Bridge Area

**DRAWING TITLE**  
 Car Cruising Signage - Great  
 Bridge

SCALE	Not to scale
ISSUED BY	S Chadwick
DATE	17th Jan 2023
DRAWN BY	Sharon Lang
DRAWING No	40973 S/4



# LOCATION PLAN

Dudley Port  
Tipton  
near to junction with  
Sedgley Road East

Location 13  
Foamex Car Cruising  
sign

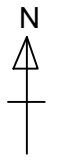
SEDGLEY ROAD EAST

DUDLEY PORT

GROVELAND ROAD

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



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

**PROJECT**  
Car Cruising  
Signage

**LOCATION**  
Great Bridge Area

**DRAWING TITLE**  
Car Cruising Signage - Great  
Bridge

**SCALE** Not to scale

**ISSUED BY** S Chadwick

**DATE** 17th Jan 2023

**DRAWN BY** Sharon Lang

**DRAWING No** 40973/1 S/4



# LOCATION PLAN

## Kenrick Way West Bromwich

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

**PROJECT**  
Car Cruising Signage

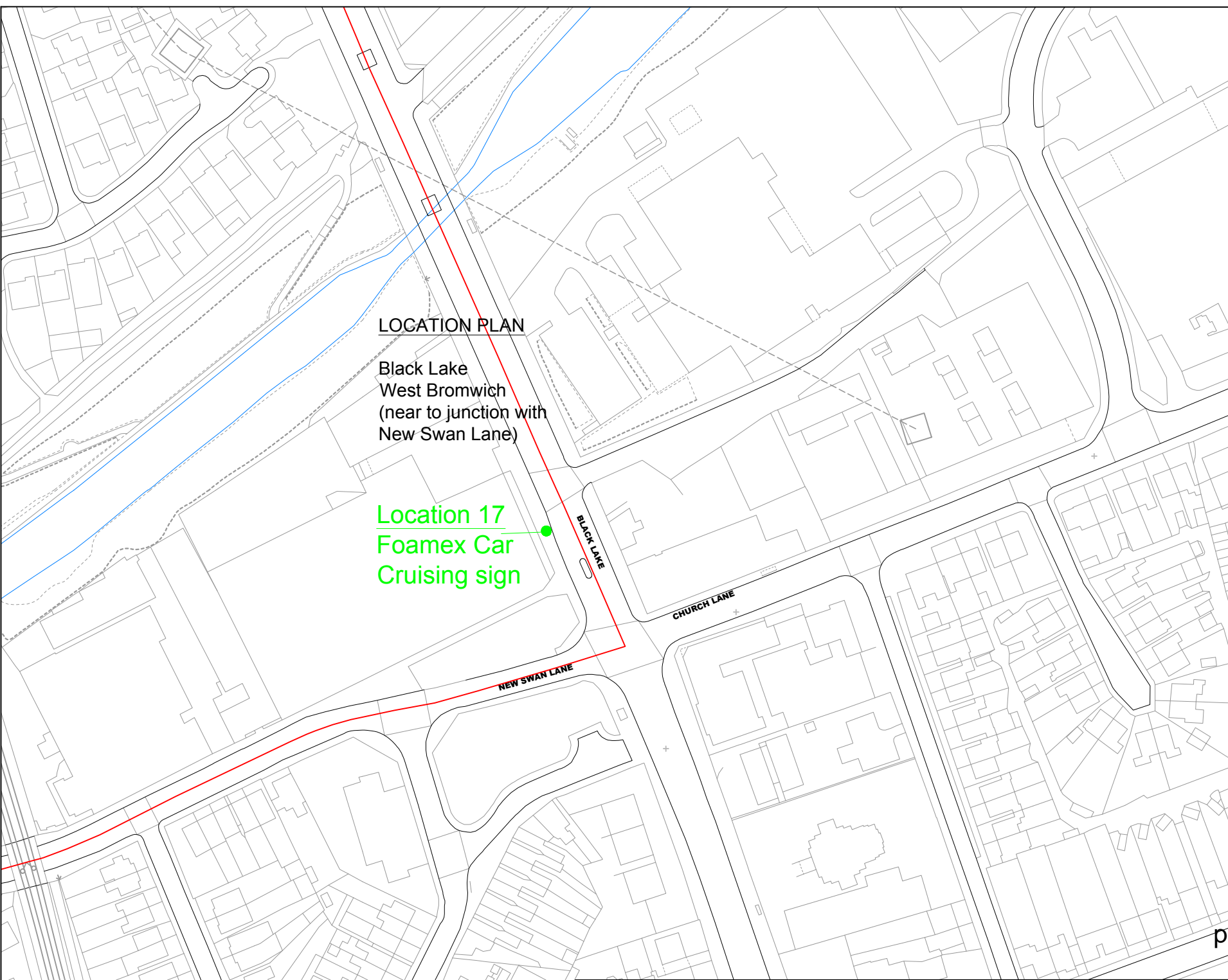
**LOCATION**  
Kenrick Way,  
West Bromwich

**DRAWING TITLE**  
Car Cruising Signage -  
West Bromwich

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



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



**LOCATION PLAN**

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

Location 17  
Foamex Car  
Cruising sign



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

**PROJECT**  
Car Cruising  
Signage

**LOCATION**  
Kenrick Way,  
West Bromwich

**DRAWING TITLE**  
Car Cruising Signage -  
West Bromwich

**SCALE** Not to Scale

**ISSUED BY** S Chadwick

**DATE** 2nd Aug 2023

**DRAWN BY** Sharon Lang

**DRAWING No** 41141/1 S/4

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

# BIRCHLEY ISLAND

## LOCATION PLAN

Electricity Distribution Site

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

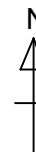


**Location 21**  
**Large Metal type**  
**Car Cruising Sign**

**Location 18**  
**Foamex Car Cruising**  
**sign**

**Location 19**  
**Foamex Car Cruising**  
**sign**

**Location 20**  
**Foamex Car Cruising**  
**sign**



**HIGHWAYS GROUP MANAGER**

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

**PROJECT**  
Car Cruising  
Signage

**LOCATION**  
Oldbury

**DRAWING TITLE**  
Car Cruising Signage -  
Oldbury Area

**SCALE** Not to Scale

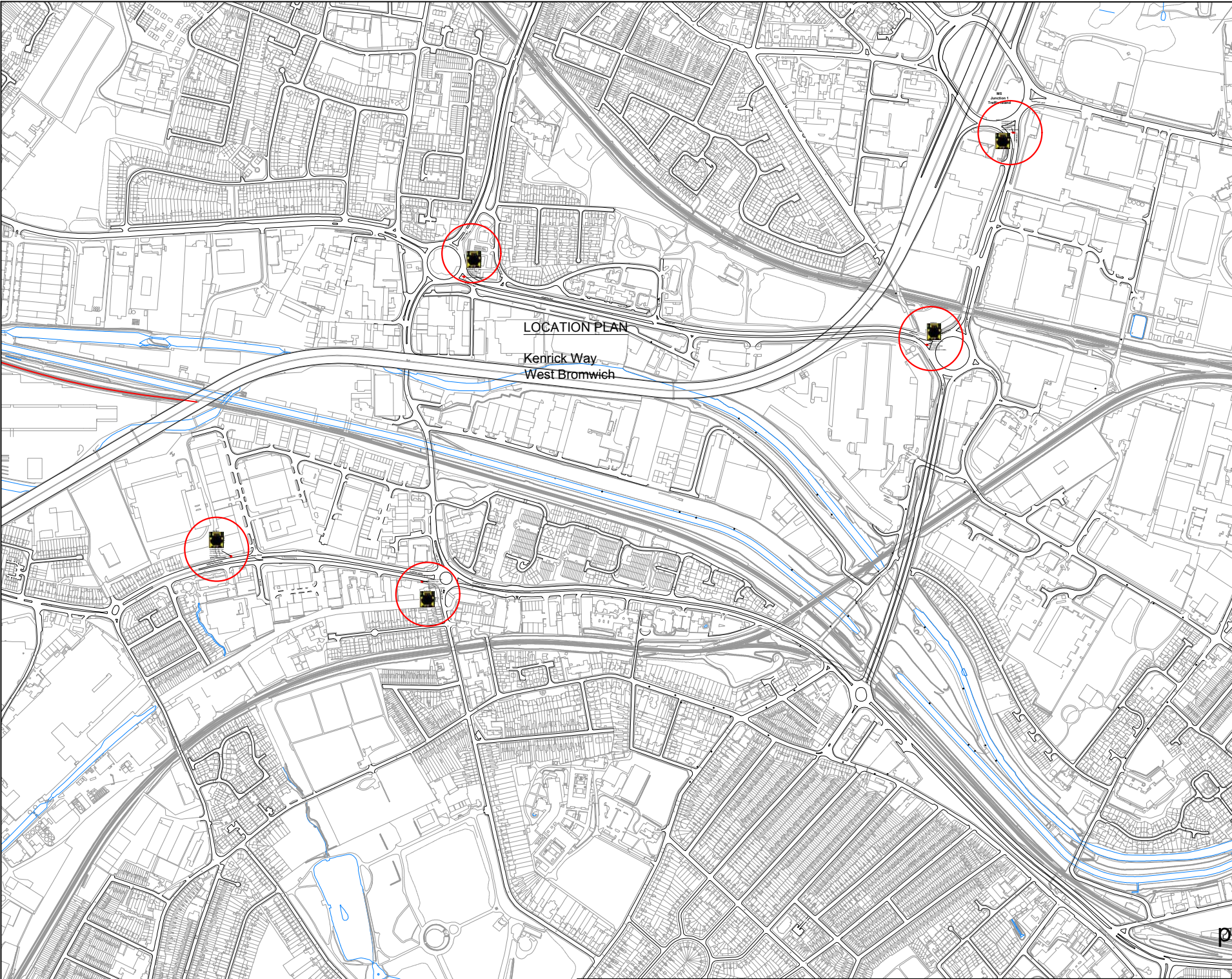
**ISSUED BY** S Chadwick

**DATE** 17th Jan 2023

**DRAWN BY** Sharon Lang

**DRAWING No** 41138 SJ4





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



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

**PROJECT**  
 Car Cruising Signage

**LOCATION**  
 Kenrick Way,  
 West Bromwich

**DRAWING TITLE**  
 Car Cruising Signage -  
 West Bromwich

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

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

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

**Claim No. KB-BHM-2022-000188**

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

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

**Claimants**

**-and-**

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

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

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

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

5. Mr ANTHONY PAUL GALE

6. Miss WIKTORIA SCZCUBLINSKA

7. Mr ISA IQBAL

8. Mr MASON PHELPS

**Defendants**

---

**SECOND WITNESS STATEMENT OF STEVEN GITTINS**

---



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

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

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

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



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

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

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

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

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

The remaining smaller Foamex signs are at locations detailed below.

1. Coppice Road      Brownhills      Lamppost 3
2. Coppice Road      Brownhills      Lamppost 5
3. Maybrook Road      Brownhills      Lamppost 13
4. Black Country New Road, Pedestrian Crossing, Lamppost 19

11. In consultation with the police, it has been agreed that temporary signs will be ordered and replaced on the Black Country New Road, Moxley High Street and Moxley Road. Also, in response to concerns raised by residents, temporary signs will also be replaced on Brickyard Road and Northgate Way Aldridge. In total this will number in the region of 15 replacement signs. In order to allow for any further replacements that may be required over time, and to respond to any new emerging hotspots, 50 of the temporary Foamex signs will be ordered. An order is being raised for the replacements signs and highways have confirmed that they will undertake installation which it is anticipated will be completed in late February/early March. Walsall Council's Highways dept will also undertake regular inspections of the signs, inspecting those on A Roads every two months and any others at least every three months. This first inspection will be completed by 1st April 2024 and any issues, or missing signs will be reported to Community Safety for follow up/corrective action.
  
12. Although the situation in respect of car cruising/street racing in Walsall has improved since the original injunction was granted, reports of this dangerous anti-social activity and the dangers associated with it are still received, and it




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

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

**Statement of Truth**

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

**Signed**



**Date**

05/02/2024

**Print name in full** STEVEN JOHN GITTINS

Claimant  
Steven Gittins  
Second Witness  
Statement  
05 February 2024

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

**BETWEEN:**

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

**Claimants**

**-and-**

**PERSONS UNKNOWN**

**Respondents**

---

**WITNESS STATEMENT OF STEVEN GITTINS**

---

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

**Ref: LIJ017753P/01314155**

**Solicitor for the Council**

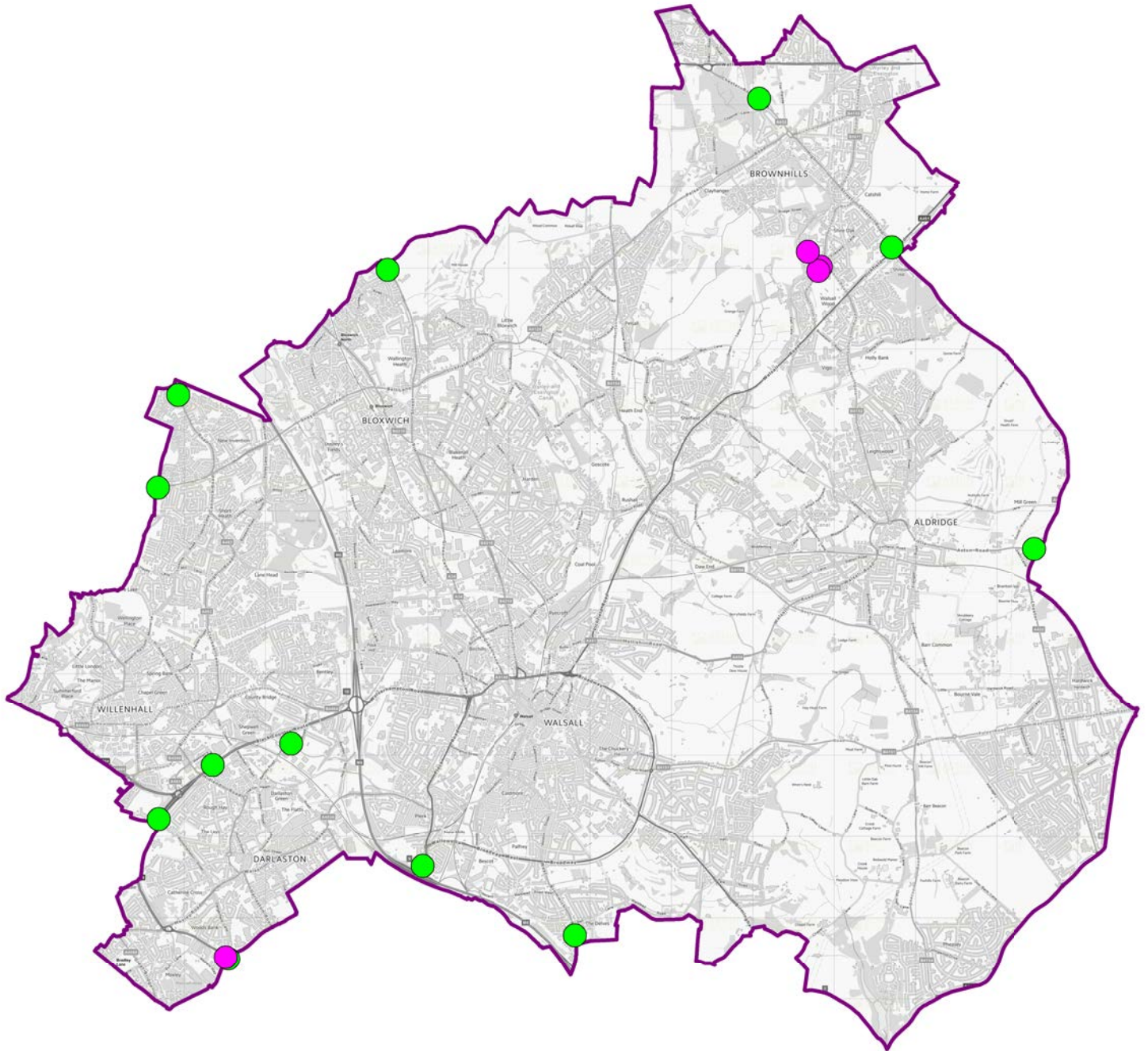




### Walsall Street Racing Signs

**● Street Racing Small Foamex Signs**

**● Street Racing Large Fixed Signs**



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

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

**CLAIM NO: KB-2022-BHM-000188**

**BETWEEN:**

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

**Claimants**

**-and-**

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

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

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

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

**Defendants**

---

**WITNESS STATEMENT OF PARDIP SANDHU**

---



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

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief.
2. This is my sixth statement in this matter.
3. This statement is to confirm that new signage has now been installed in the following areas within Sandwell. These include Birmingham Road, Oldbury on the dual carriageway between the junctions of Rood End Road, and Mallin Street, Smethwick. The sign is double sided and visible to motorists travelling both east and west.
4. The other signs have been installed on Kenrick Way, West Bromwich, at the junction with Trinity Way. The sign is located on the centre refuge and visible to motorists travelling both east and west. The other sign is located on the centre refuge and visible to motorists travelling east towards Smethwick.
5. Another sign is located on the centre refuge and visible to motorists travelling south towards Smethwick. Photographs highlighting these signs are here marked as “**PS4**” which I exhibit to my statement.

Statement of Truth

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

Signed



Date

20/2/2024

Print name in full Pardip Sandhu



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

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

**Claimants**

**-and-**

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

**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)**

---

**EXHIBIT "PS4"**

---

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

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

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

**Claimants**

**-and-**

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

**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**

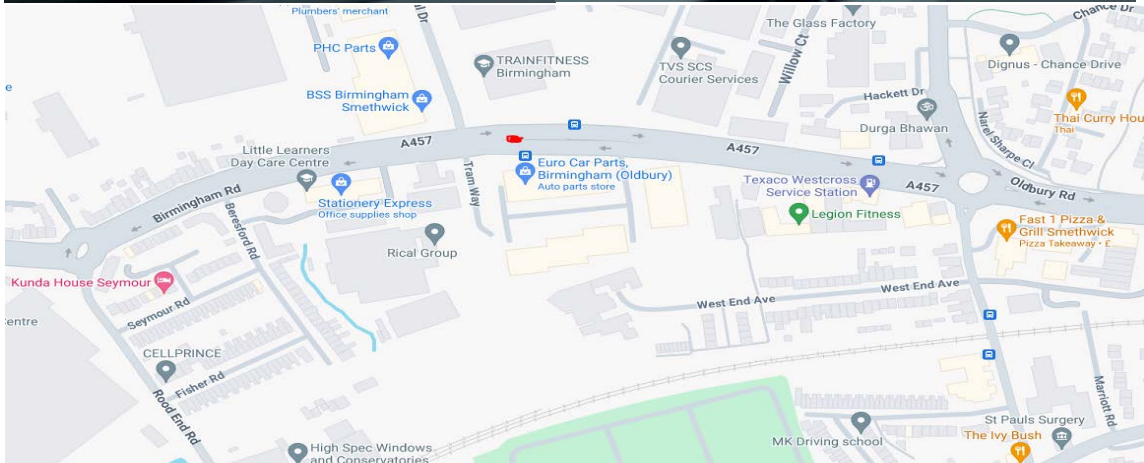
**WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)**

**WITNESS STATEMENT OF  
PARDIP SANDHU**



**Location : Birmingham Road, Oldbury**

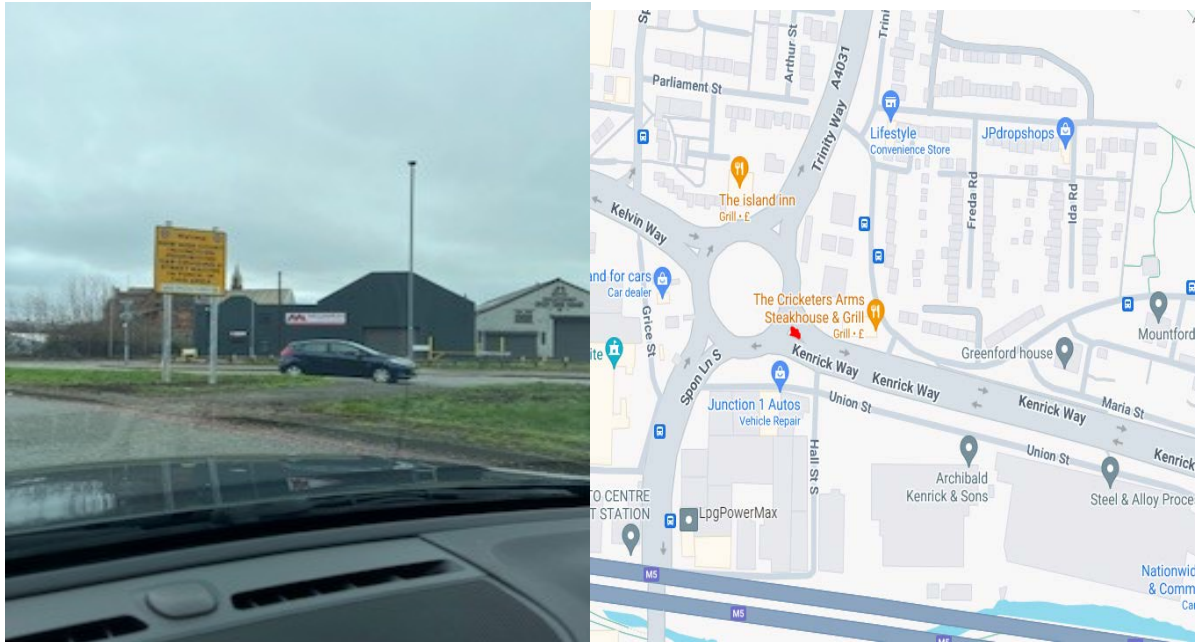
Dual carriageway between the junctions of Rood End Road and Mallin Street, Smethwick.  
The sign is double sided and visible to motorists travelling both east and west



**Location : Kenrick Way, West Bromwich**

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

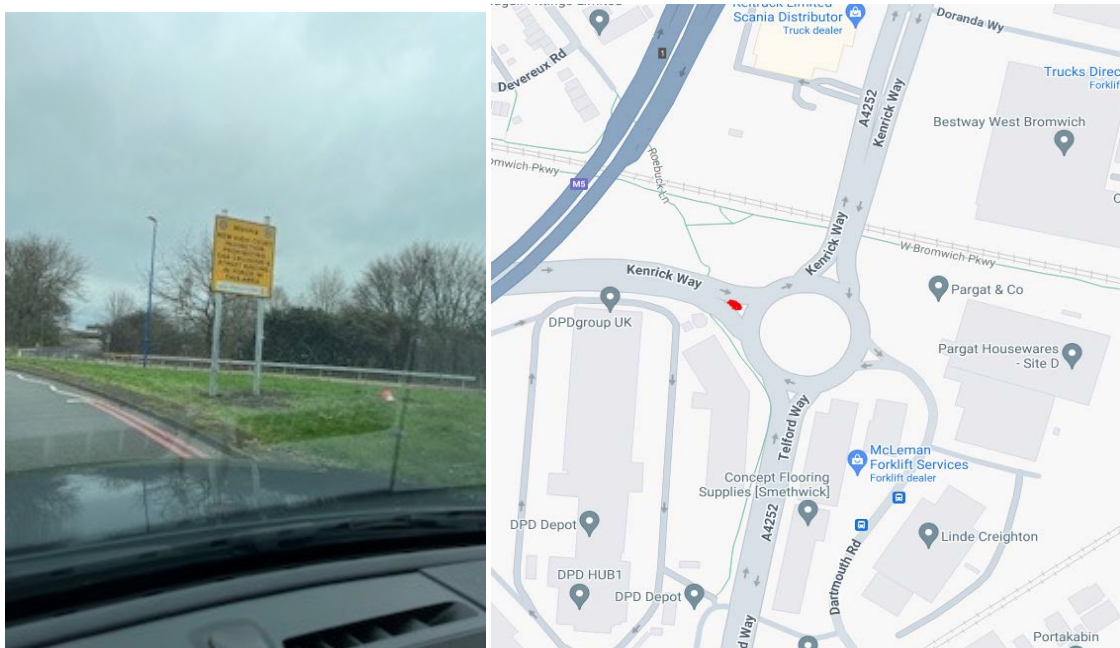
Sign is located on the centre refuge and visible to motorists travelling east towards Smethwick



**Location : Kenrick Way, West Bromwich**

Kenrick Way, West Bromwich at the junction Telford Way.

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

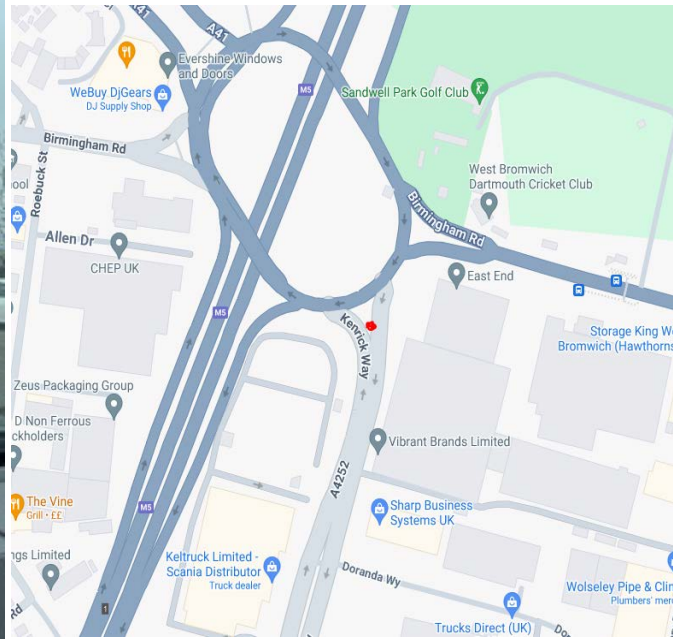


**Location : Kenrick Way, West Bromwich**



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

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



# Certificate of service

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

On what day did you serve?

The date of service is

## What documents did you serve?

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

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## On whom did you serve?

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

Ms Amanda Jenkins – Solicitor for Mr Gale (5<sup>th</sup> Defendant)

## How did you serve the documents?

(please tick the appropriate box)

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

e-mail sent to: [amanda.jenkins@waldrons.co.uk](mailto:amanda.jenkins@waldrons.co.uk) at 15.26 hours

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

e-mail sent to: [amanda.jenkins@waldrons.co.uk](mailto:amanda.jenkins@waldrons.co.uk)

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

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

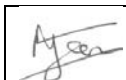
Specified business e-mail address (as given at the hearing on 3 October 2023 where the Court ordered the 5<sup>th</sup> Defendant be joined as a party to the injunction and injunction application).

## I believe that the facts stated in this certificate are true.

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

Full name

Signed



Claimants' Solicitor

Position or office held

(If signing on behalf of firm or company)

Date



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

#### **Calculation of deemed day of service of a claim**

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

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# Certificate of service

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

On what day did you serve?

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## On whom did you serve?

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

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

## How did you serve the documents?

(please tick the appropriate box)

- by first class post or other service which provides for delivery on the next business day
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e-mail sent to: [elle.may.macey@waldrons.co.uk](mailto:elle.may.macey@waldrons.co.uk) at 15.26 hours

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

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

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

## I believe that the facts stated in this certificate are true.

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

Full name

Signed   
Claimants' Solicitor

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

Date



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# Certificate of service

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

On what day did you serve?

The date of service is

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**On whom did you serve?**

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

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

**How did you serve the documents?**

(please tick the appropriate box)

- by first class post or other service which provides for delivery on the next business day
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- by other electronic means (15.24 hours 01 March 2024) (Please specify time sent, where document is other than a claim form)

e-mail to: [olivia@charlesstrachan.com](mailto:olivia@charlesstrachan.com) at 15.24 hours  
[mandy@charlesstrachan.com](mailto:mandy@charlesstrachan.com) at 15.24 hours

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

e-mail sent to: [olivia@charlesstrachan.com](mailto:olivia@charlesstrachan.com) and [mandy@charlesstrachan.com](mailto:mandy@charlesstrachan.com)

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

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- last known residence
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- other (please specify)

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

**I believe that the facts stated in this certificate are true.**

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

Full name

Signed   
Claimants' Solicitor

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

Date

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<b>Name of court</b> THE HIGH COURT OF JUSTICE, KING'S BENCH DIVISION, BIRMINGHAM DISTRICT REGISTRY	<b>Claim No.</b> KB-2022-BHM-000188
<b>Name of Claimant</b> WOLVERHAMPTON CITY COUNCIL, DUDLEY MBC, SANDWELL MBC & WALSALL MBC	
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On what day did you serve?

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## On whom did you serve?

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

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

## How did you serve the documents?

(please tick the appropriate box)

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- by other electronic means (15.25 hours 01 March 2024) (Please specify time sent, where document is other than a claim form)

e-mail sent to: [masonphelps36@hotmail.co.uk](mailto:masonphelps36@hotmail.co.uk) at 15.25 hours

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

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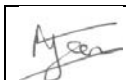
Specified personal e-mail address (as given at the hearing on 29 January 2024 as the address for service on the Defendant where the Court ordered the 8<sup>th</sup> Defendant be joined as a party to the injunction and injunction application).

## I believe that the facts stated in this certificate are true.

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

Full name

Signed



Claimants' Solicitor

Position or office held

(If signing on behalf of firm or company)

Date

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## On whom did you serve?

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

Mr William Harrington - Solicitor for Ms Rebecca Richold (9<sup>th</sup> Defendant)

## How did you serve the documents?

(please tick the appropriate box)

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e-mail sent to: [william.harrington@harringtonslegal.co.uk](mailto:william.harrington@harringtonslegal.co.uk) at 15.25 hours

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e-mail sent to: [william.harrington@harringtonslegal.co.uk](mailto:william.harrington@harringtonslegal.co.uk)

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

- usual residence
- last known residence
- place of business
- principal place of business
- last known place of business
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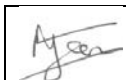
E-mail address (as cited at the hearing on 27 February 2024 as the address for service on the Defendant – being the hearing at which the Court ordered the 9<sup>th</sup> Defendant be joined as a party to the injunction and injunction application).

## I believe that the facts stated in this certificate are true.

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

Full name

Signed



Claimants' Solicitor

Position or office held

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## Adam Sheen

---

**From:** Adam Sheen  
**Sent:** 01 March 2024 15:26  
**To:** amanda.jenkins@waldrons.co.uk  
**Subject:** WOLVERHAMPTON CITY COUNCIL, DUDLEY MBC, SANDWELL MBC & WALSALL MBC v PERSONS UNKNOWN AND OTHERS - Final Sealed Orders from Hearing 27 February 2024 (Your Client: Mr A Gale)  
**Attachments:** 2091936 - Plan A (Sealed) 27 February 2024.pdf; 2091934 - Indices (Sealed) 27 February 2024.pdf; 2091936 - Plan A (Sealed) 27 February 2024.pdf; 2091933 - Final Orders - Power of Arrest (Black Country) (Sealed).pdf; 2091931 - Final Injunction (Black Country) (Sealed) 27 February 2024.pdf; 2091930 - Directions Accompanying Final Order (Black Country) (Sealed) 27 February 2024.pdf; 2091929 - Amended Particulars of Claim (Version 6) (Sealed) 27 February 2024.pdf; 2091928 - Amended Claim Form (Version 6) (Sealed) 27 February 2024.pdf; 2091935 - Order joining Rebecca Richold as a party (Sealed) 27 February 2024.pdf  
**Importance:** High

### FAO: Ms Amanda Jenkins

Dear Sirs,

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

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

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

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

Thank you for your attention in this matter.

Yours faithfully

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

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## Adam Sheen

---

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

**Attachments:** 2091936 - Plan A (Sealed) 27 February 2024.pdf; 2091934 - Indices (Sealed) 27 February 2024.pdf; 2091936 - Plan A (Sealed) 27 February 2024.pdf; 2091933 - Final Orders - Power of Arrest (Black Country) (Sealed).pdf; 2091931 - Final Injunction (Black Country) (Sealed) 27 February 2024.pdf; 2091930 - Directions Accompanying Final Order (Black Country) (Sealed) 27 February 2024.pdf; 2091929 - Amended Particulars of Claim (Version 6) (Sealed) 27 February 2024.pdf; 2091928 - Amended Claim Form (Version 6) (Sealed) 27 February 2024.pdf; 2091935 - Order joining Rebecca Richold as a party (Sealed) 27 February 2024.pdf

### FAO: Ms Elle-May Macey

Dear Sirs,

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

Claim no: KB-2022-BHM-000188

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

Your Client – Mr Isa Iqbal (7<sup>th</sup> Defendant)

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

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

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

Thank you for your attention in this matter.

Yours faithfully

Adam Sheen  
Solicitor-Advocate (Civil & Criminal)  
Tel. 01902 554926  
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## Adam Sheen

---

**From:** Adam Sheen  
**Sent:** 01 March 2024 15:24  
**To:** olivia@charlesstrachan.com; mandy@charlesstrachan.com  
**Subject:** WOLVERHAMPTON CITY COUNCIL, DUDLEY MBC, SANDWELL MBC & WALSALL MBC v PERSONS UNKNOWN AND OTHERS - Final Sealed Orders from Hearing 27 February 2024 (Your Client: Miss W Szczublinska)  
**Attachments:** 2091936 - Plan A (Sealed) 27 February 2024.pdf; 2091934 - Indices (Sealed) 27 February 2024.pdf; 2091936 - Plan A (Sealed) 27 February 2024.pdf; 2091933 - Final Orders - Power of Arrest (Black Country) (Sealed).pdf; 2091931 - Final Injunction (Black Country) (Sealed) 27 February 2024.pdf; 2091930 - Directions Accompanying Final Order (Black Country) (Sealed) 27 February 2024.pdf; 2091929 - Amended Particulars of Claim (Version 6) (Sealed) 27 February 2024.pdf; 2091928 - Amended Claim Form (Version 6) (Sealed) 27 February 2024.pdf; 2091935 - Order joining Rebecca Richold as a party (Sealed) 27 February 2024.pdf

### **FAO: Ms Olivia Stenton & Ms Mandy Edwards**

Dear Sirs,

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

**Claim no: KB-2022-BHM-000188**

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

**Your Client – Miss Wiktoria Szczublinska (6<sup>th</sup> Defendant)**

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

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

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

Thank you for your attention in this matter.

Yours faithfully

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Email: adam.sheen@wolverhampton.gov.uk

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## Adam Sheen

---

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

**Attachments:** 2091936 - Plan A (Sealed) 27 February 2024.pdf; 2091934 - Indices (Sealed) 27 February 2024.pdf; 2091936 - Plan A (Sealed) 27 February 2024.pdf; 2091933 - Final Orders - Power of Arrest (Black Country) (Sealed).pdf; 2091931 - Final Injunction (Black Country) (Sealed) 27 February 2024.pdf; 2091930 - Directions Accompanying Final Order (Black Country) (Sealed) 27 February 2024.pdf; 2091929 - Amended Particulars of Claim (Version 6) (Sealed) 27 February 2024.pdf; 2091928 - Amended Claim Form (Version 6) (Sealed) 27 February 2024.pdf; 2091935 - Order joining Rebecca Richold as a party (Sealed) 27 February 2024.pdf

Dear Mr Phelps,

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

**Claim no: KB-2022-BHM-000188**

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

**FAO: Mr Mason Phelps (8<sup>th</sup> Defendant)**

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

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

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

Thank you for your attention in this matter.

Yours sincerely

Adam Sheen  
Solicitor-Advocate (Civil & Criminal)  
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## Adam Sheen

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**From:** Adam Sheen  
**Sent:** 01 March 2024 15:25  
**To:** william.harrington@harringtonslegal.co.uk  
**Subject:** WOLVERHAMPTON CITY COUNCIL, DUDLEY MBC, SANDWELL MBC & WALSALL MBC v PERSONS UNKNOWN AND OTHERS - Final Sealed Orders from Hearing 27 February 2024 (Your Client: Miss R Richold)  
**Attachments:** 2091936 - Plan A (Sealed) 27 February 2024.pdf; 2091934 - Indices (Sealed) 27 February 2024.pdf; 2091936 - Plan A (Sealed) 27 February 2024.pdf; 2091933 - Final Orders - Power of Arrest (Black Country) (Sealed).pdf; 2091931 - Final Injunction (Black Country) (Sealed) 27 February 2024.pdf; 2091930 - Directions Accompanying Final Order (Black Country) (Sealed) 27 February 2024.pdf; 2091929 - Amended Particulars of Claim (Version 6) (Sealed) 27 February 2024.pdf; 2091928 - Amended Claim Form (Version 6) (Sealed) 27 February 2024.pdf; 2091935 - Order joining Rebecca Richold as a party (Sealed) 27 February 2024.pdf

### FAO: Mr William Harrington

Dear Sirs,

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

**Claim no: KB-2022-BHM-000188**

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

**Your Client – Miss Rebecca Richold (9<sup>th</sup> Defendant)**

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

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

1. Final Injunction and Appendices referred to therein (namely, the indices and Plan A);
2. Final Power of Arrest and Plan A referred to therein;
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4. Amended Claim Form (Version 6);
5. Amended Particulars of Claim; and
6. Order joining Ms Rebecca Richold as a party (9<sup>th</sup> Defendant).

Thank you for your attention in this matter.

Yours faithfully

Adam Sheen  
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Email: adam.sheen@wolverhampton.gov.uk

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