

BETWEEN:

- (1) QWR Properties NW07 Limited
- (2) Wembley NW07 Investments Limited
- (3) QWR Properties NW09 Limited
- (4) QWR Properties E01 Limited
- (5) QWR Properties E03 Limited
- (6) QWR Properties E05 Limited
- (7) QWR Properties SW03A Limited
- (8) QWR Properties NE02 Limited
- (9) QWR Properties NE03 Limited

Claimants

-and-

PERSONS UNKNOWN ENTERING OR REMAINING ON ANY PART OF THE QUINTAIN BTR ESTATE,
WEMBLEY PARK WITHOUT THE CONSENT OF THE CLAIMANTS THEIR AGENTS OR ANY LAWFUL
OCCUPIER OF THE QUINTAIN BTR ESTATE

Defendant

BRIEF DETAILS OF CLAIM

1. The Claimants are each leasehold proprietors of land and buildings within the estate surrounding Wembley Stadium in North London known as the Wembley Estate.
2. The Wembley Estate includes 9 private residential buildings with common parts which are referred to as the "Quintain BTR Estate" at para 4 below and identified on the table at para 3 below.
3. The Claimants' ownership of each relevant parcel of land within the Quintain BTR Estate is summarised in the following table:

Building Name(s)	HMLR Title No	Leasehold Proprietor entity
Landsby	AGL457333	QWR Properties NW07 Limited
Landsby	AGL404303	Wembley NW07 Investments Limited
Repton Gardens	AGL585386	QWR Properties NW09 Limited
Madison	AGL523902	QWR Properties E01 Limited
Canada Gardens	AGL489281	QWR Properties E03 Limited
The Robinson	AGL547018 *Lease dated 8 July 2021	QWR Properties E05 Limited
Ferrum (Fe1)	AGL489550	QWR Properties SW03A Limited
Ferrum (Fe2 and Fe3)	AGL509755	QWR Properties SW03A Limited
Solar	being registered at LR (AGL640093) *Lease dated 23 January 2025	QWR Properties NE02 Limited
Lunar	being registered at LR (AGL640082) *Lease dated 23 January 2025	QWR Properties NE03 Limited

4. The Claimants interests are held as part of the operational business interests of the Quintain Group of Companies for the purpose of operating a “Build to Rent” residential business within the buildings owned by the Claimants referred to in this claim as the “Quintain BTR Estate” which are the buildings shown coloured on the plan attached to these brief details of claim.
5. The Quintain BTR Estate is occupied by various tenants of the Claimants, the vast majority of whom occupy under assured shorthold tenancies.
6. The Claimants have a right to possession of the Quintain BTR Estate and are in paramount control of the Quintain BTR Estate with the right to control access thereto and on any view have a better right to possession than the Defendants.
7. Full evidence of the titles of the Claimants to their parcels of land are set out in the Witness Statement of Sarah Birchley dated 1 July 2025 which accompanies and supports this claim.
8. The Defendants are a defined category of Persons Unknown (defined in accordance with the principles set out in *Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors*

[2023] UKSC 47). The Claimants have not been able to identify and name any Defendant to these proceedings at this time.

9. The occupiers of the Quintain BTR Estate and the Claimants have suffered for a number of years and are continuing to increasingly suffer repeated and continuing acts of trespass by the Defendants entering the private buildings and common areas within the Quintain BTR Estate without the consent of any of the Claimants or their occupational tenants.

10. As more particularly set out in the evidence, on various dates from 2018 to the current day numerous trespasses into the Quintain BTR Estate have effected by persons unknown, who, as set out above, remain unidentified but who appear to primarily comprise groups of youths, deliberately evading the security systems (including by forcing open doors, tailgating residents and using other means to disable locking mechanisms) in order to enter the residential buildings, restricted and common areas without consent or any lawful right to be there, and engage in various activities within the Claimants' property including:

10.1 Gaining access to the roof and sitting on the edge of the rooftops outside of the safety railings.

10.2 Congregating in stairwells and corridors of the buildings;

10.3 Smoking, drug use, and alcohol consumption within common parts of the buildings which are for the sole use of the residents;

10.4 Engaging in threatening or intimidating behaviour towards Quintain staff, residents and other lawful visitors such as delivery personnel;

10.5 Littering, urination and criminal damage to property within the common or other restricted areas of the buildings;

10.6 Damaging fixtures, doors and CCTV equipment within the common or other restricted areas of the buildings.

10.7 Engaging in "lewd" or sexual conduct within the buildings.

11. The said acts of trespass have been persistent and have resulted in damage to property of the Claimants, significantly undermining the sense of security and privacy within the estate, and have

subjected the Claimants' staff and the Claimants' occupational tenants to acts of intimidation and anti-social behaviour, and caused discomfort and distress.

12. Full details of the trespasses that have been experienced to date are provided in the witness statement of Gareth Bone dated 1 July 2025 which accompanies and supports this claim.
13. The Claimants have taken all sensible and reasonable precautions to try and prevent or manage unauthorised access and guard against ongoing trespass by putting robust measures in place including security guards, CCTV cameras and security doors, which have been shown to be ineffective as a deterrent. The said trespasses have continued in the face of all such measures, with over 100 incidents a month having recently been reported across the Quintain BTR Estate as a whole, and such incidents continuing to occur on a weekly, and more often than not, daily, basis.
14. The Claimants reasonably apprehend that, absent injunctive relief, further acts of trespass will continue to occur and that such continued trespass will cause irreparable harm to Claimants, to its security staff involved in incidents, to the security of the buildings, the Estate, and to the residents whose ability to enjoy the premises will continue to be adversely affected and who will continue to suffer inconvenience, distress, discomfort and insecurity as a result. Further ongoing trespass will continue to undermine the security of the Estate, cause additional reputation damage to the Claimants and result in irrecoverable financial loss and loss of amenity.
15. It is possible to give effective notice of any injunction including by ensuring that it is prominently displayed around the perimeter of the buildings and the Claimants propose to give notice of this claim and the supporting documents, and of any order granted, as set out in the statement of Sarah Birchley dated 1 July 2025 and the draft injunction order.

AND THE CLAIMANTS CLAIM:-

- (1) the injunctive relief set out in the draft injunction order; and/or
- (2) further or other relief as the court thinks fit.

STATEMENT OF TRUTH

The Claimants believe that the facts stated in these Details of Claim are true

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

I am authorised by the Claimants to sign this statement of truth on their behalf

Dated

1 July 2025

Signed



Carr Jeremy Luke Stephen, Partner, Clyde & Co LLP