

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

Claim No:

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

WITNESS STATEMENT OF GARETH BONE

I, Gareth Bone, of 180 Great Portland Street, London W1W 5QZ, say as follows:

Introduction

1. I am employed by Quintain Living Limited (“Quintain”) as Regional Operations Manager, with responsibility for the day-to-day overall management, security and operational

integrity of the residential parts of the Wembley Park Estate, also known as the Quintain BTR Estate (“the Quintain BTR Estate”). I have held this position since 2023 and prior to this I held the position of Operations Manager for Quintain since 2019 and have extensive first-hand knowledge since then of the Quintain BTR Estate, its operations, and the challenges we face in maintaining it as a safe and secure environment.

2. I make this witness statement in support of an application for an interim injunction to restrain persons unknown from entering or remaining on the Quintain BTR Estate without permission as per the terms of the draft order provided with this application.
3. The facts and matters in this statement are within my own knowledge unless otherwise stated. Where I refer to information provided by others, the sources of such information are identified, and I believe such information to be true.
4. I have read the statement of my colleague Sarah Birchley, and I adopt the definitions from that statement in this statement.
5. References to Claimants and Quintain are used interchangeably as the Claimant entities are corporate vehicles for the purpose of holding the property interests but Quintain Living Limited has complete operational control.
6. This application is necessary due to persistent and escalating incidents of unlawful trespass which, as explained in this statement, pose a serious risk to safety, property, reputation and the enjoyment of the Quintain BTR Estate by lawful residents.
7. As I will explain below, there has been a long-standing history of trespass into the buildings within the Quintain BTR Estate which the Claimants have tried to manage but the level of incidence of trespass has now exceeded a level which the Claimants are able to control, and the assistance of the court is required to help mitigate these ongoing risks.

It is clear that the situation will continue and I am seriously concerned that it is likely to deteriorate if a precautionary injunction to prevent further encroachments is not granted.

8. I have been dealing with issues arising from trespassers' activity throughout my employment with Quintain and after exploring all other avenues for combating this issue (namely enhanced security measures to make it more difficult for trespassers to gain access and increasing the security presence to try and deter the behaviour, liaising with the police and the Wembley Park Estate security team and practical measures including training the Resident Team on how to deal with anti-social behaviour and how to manage situations in such a way as to de-escalate interactions that have the potential to become hostile), it is my firm view that the only effective deterrent against these trespassers is the threat of direct personal consequences to the perpetrators.

Historic Trespass by Persons Unknown

9. Because of its immediate proximity to Wembley Stadium and large well-established communities in the directly adjoining residential areas, the Quintain BTR Estate has been the target of unlawful incursions in the past, even before it was completed and tenanted. I understand from speaking to my colleagues who have worked at Quintain for longer than I have, that concerns over the risk of trespass in the Wembley Park Estate first arose during the construction phase of the Quintain BTR Estate from 2006 onwards, when the Claimants experienced repeated attempts by unauthorised individuals to gain access to the active construction sites with a view to scaling the buildings or cranes and then filming themselves at the top.
10. There was, around the time, a trend towards and a significant rise in "urban exploring" which was being fanned by the emergence of social media, where individuals would gain

access to tall buildings / building sites under construction, to obtain notoriety in publishing their exploits on social media.

11. The Quintain BTR Estate began to suffer increasing incidents of “urban exploring” based trespass which became more and more frequent.

12. In the end, Quintain took the decision to seek injunctions to restrain this activity and successfully applied for injunctions to deter unlawful access to the sites enclosed by construction fencing during the construction phases of the Quintain BTR Estate. The first injunction was granted in 2018 against one named individual (who also climbed the Shard around the same time) and Persons Unknown and which was followed by two further orders in 2022 and 2023. There was evidence that the person who climbed the Shard was attracted to the high cranes involved in the construction project in the vicinity of Wembley Stadium so that he could look down on the arch over Wembley Stadium, and in social media he has expressed a passion one day to evade the security at Wembley and to place himself in the middle of the arch.

13. The injunctions proved effective and prevented the incidence of dangerous climbing and intrusion. I exhibit two sealed orders from these previous proceedings dated 16 December 2022 and 16 February 2023 respectively **GB01/01 and 02 pages 2 -15**.

14. Although those incidents involved a small group of specific individuals who were trespassing for a very specific purpose, the issues which have been experienced since the Quintain BTR Estate opened for occupation and which are described below, present a broader, ongoing problem. The level of trespass and sheer volume of incidents that have been experienced demonstrates that the development remains a clear target for, and vulnerable to, acts of trespass by reason of its nature as a curated private space providing amenities for its residents, and its particular location to Wembley Stadium and the surrounding residential areas.

Post-construction incidents of trespass

15. Once buildings on the Quintain BTR Estate began to open for occupation in 2018, Quintain began experiencing a new wave of unlawful activity in the form of repeated trespass by a broad group of unknown individuals who were intent on accessing the private communal spaces, the rooftops, and other secure areas of the residential buildings, as set out below.
16. The earliest post-construction trespass incident I am personally aware of occurred in July 2022 when trespassers tailgated a resident into Canada Gardens and behaved in an anti-social manner by smoking and loitering on the podium area (a private amenity space for residents, not accessible to the public). Soon after that incident, I began to have conversations with the security team because it was clear at that stage that trespassers were prepared to go to great lengths to evade security.
17. Since then, the problem of ongoing trespasses into the buildings within the Quintain BTR Estate by unknown persons who appear intent on evading the security and entering into private areas has grown year-on-year. Over the years, this has become an ever-present issue and is becoming more frequent and the activities are getting worse and certainly not diminishing.
18. I say this is because I personally have seen an increase in the number of trespass incidents, (as is recorded by the Security Logs and illustrated in the Graph referred to below), and also because the size of the groups is increasing with more individual trespassers per incident. The lengths that they will go to in order to gain access have increased with individuals holding the doors open for their friends and using tools or loose items to force doors open, despite our increased security measures, and most concerning of all, the persons unknown's behaviour has become more abusive and threatening when they are asked to leave by members of my team. I think the more they

are 'getting away with it' the worse they are behaving as they seem to me to be much getting much more bold due to the lack of consequences for their actions.

19. The specific nature of the trespass incidents is described in more detail below along with specific examples. As is apparent, a clear pattern has emerged over time of trespassing which includes groups of teenage boys and some girls repeatedly entering the buildings for sport and being disruptive and causing damage and discomfort to residents and staff members (see paragraph 44 below).
20. I exhibit two graphs that tracks the frequency of overall incidents since January 2023 by reference to each building ("the Graphs") **GB01/03 pages 16 and 17**. This data from the Graphs is sourced from all recorded incidents from my team's security logs which I discuss below.
21. Although the frequency of incidents fluctuates from time to time, the Graphs show a clear increase in the incidents of trespass since January 2023, where 15 incidents were recorded in the month, to January 2025 where 124 incidents were recorded in the month. The Graphs also show that the problem exists across all of the buildings within the Quintain BTR Estate that are currently occupied, with Canada Gardens, The Robinson and Landsby being the most highly targeted.
22. The Quintain BTR Estate is not accessible to the general public. The buildings within the Estate are intended to be secure with the external doors to each of the residential blocks being locked doors which are accessible using the access control system Salto by using electronic key fobs which are provided to residents. Whilst all external entry doors can be accessed using key fobs, only some entry doors have intercom machines installed which feed into the Salto system and allow delivery drivers or guests to call either the front desk or a specific apartment direct, both of whom can grant access remotely. All of the entry doors with intercom lead into a main lobby area and each building has one main lobby, although some lobbies have more than one entry point. All of the entry points with

intercoms are covered by CCTV. The 'move in corridor' entry doors and the fire exits can only be accessed using a key fob through the Salto system. The internal doors within the buildings also have controlled access via key fobs and there are CCTV cameras within the buildings. All of the doors are secure and it takes significant force to open one without a key fob or intercom access. Most of our doors have a 250 electro magnetic lock (EVML), which means one needs to apply 250kg of force to gain access. There are also doors that require 500kg of force in place at some locations.

23. Each building, within each development, contains one main lobby with a concierge front desk where a member of the Residents Team is based, so there are 8 across the Quintain BTR Estate. It will usually be a Resident Associate during the day from 8am to 8pm and a member of the night team at outside of those hours. I enclose a copy of the Resident Associate job description from March 2024 at **GB01/04A pages 18 to 21** which explains that "The Resident Associate is responsible for supporting the Resident Manager in ensuring the smooth operation of the buildings and providing an optimal customer experience from move-in, all the way through to move-out. This will involve managing the resolution of all reported issues from residents. This role involves working front of house and will include a lot of resident interaction to enhance resident experience". The role of a Resident Associate is intended to be a point of contact for all residents' queries, such as flagging maintenance issues, helping residents use the resident app, raising queries regarding utilities billing and tenancy renewals, taking bookings for the social spaces, helping with moving in or out and ultimately aiming to "take the stress out of living" for our residents. Whilst they are based at the desk, the Resident Associates are often called away from the desk to deal with residents' queries and so are unable to permanently monitor either the doors or the CCTV footage and doing so would not allow them to carry out their role. There is one member of the Resident Team or night team on duty per building at all times because Quintain prides itself on providing a 24/7 service.

24. As explained below, the trespassers have evaded the security measures by either tailgating residents into the buildings, or breaking in by forcing doors open. As there are

in the region of 80 access points across the Quintain BTR Estate, it is easy enough for the trespassers to find a door that is not manned. The security for the Quintain BTR Estate is outsourced to a company called PACE, who provide all members of the night teams, security guards and fire marshals. I refer to these subcontracted staff members throughout this statement as members of 'my team' as I am ultimately responsible for the security on the Quintain BTR Estate which includes day to day management of the PACE subcontractors. Apart from having one person on patrol, as it is a fire safety requirement that someone visits every part of the Quintain BTR at least once in every 24 hour period, it was never originally envisaged that dedicated security personnel would be required at the Quintain BTR Estate. The original scope of the night team was to act as an extension of the day team, with a strong focus on providing excellent service and supporting residents with general queries and helping to resolve any concerns they might have. The expectation was that the Residents Team and/or a member of the night team would triage any issues and escalate to the emergency service if sufficiently serious. However, due to a significant and sustained increase in trespassing incidents, we have had to evolve the night team's role to be more security-focused. While they still offer a low level of triage and service support to residents, their responsibilities now include more active CCTV monitoring, regular internal and external patrols, and responding directly to incidents. In line with our Fire Management Plan, they also conduct a full building patrol between the hours of 8:00 PM and 8:00 AM. As trespassing has become more frequent, they now routinely face into and manage security-related incidents, making their role more aligned with frontline security operations than was originally intended.

25. With the help of my team, we have kept records of as many trespass incidents as possible in security logs for 2023 (**GB01/04B pages 22 – 34**), 2024 (**GB01/05 pages 35 – 65**) and 2025 (**GB01/06 pages 66 – 75**) but as the annual Security Log for 2025 only includes incidents up to 26 April 2025, I have included separate monthly reports for April, May and June 2025 at **GB01/06A-C pages 76-88**) (all together the "Security Logs"). Typically,

incidents of straightforward trespass, where the trespassers are removed without causing any damage or harm, are reported by whoever witnesses them, either by posting details directly into the Whatsapp Group (discussed in detail below) during the day or by written notes included in the handover form submitted each morning by the night team. My Computer-Aided Facilities Management (CAFM) assistant Cesar collates all of these records and inputs the notes into the Security Logs. However, if the incident is more serious for any reason a follow up statement will be taken from the witness, usually by a Resident Manager/ Assistant Resident Manager or a Resident Associate, who will prepare an incident report and also carry out further enquiries to gather evidence, such as checking the CCTV records (if any) and/or collating any photos of bodycam footage that has been taken. Recording the incidents is a huge operation. I oversee the logging and data capture but my team do the hard work making the notes and collating them.

26. I must stress that even these records represent only a fraction of the overall number of successful trespass incidents that take place, let alone all of the attempts at trespass that are thwarted by staff members before the trespassers gain access to the buildings. I know this because we do not actively monitor the CCTV “live” so inevitably we miss incidents as they are occurring. If an incident is later reported we review the CCTV to build a picture of what happened and report the incident based on our findings but I assume there must be many incidents that go unnoticed. I also know that my team are not always able to keep track of the number of incidents that happen during one day, and so will often be unable to log an attempted trespass here and there while they are busy.

27. Whilst a concerted effort has been made to log incidents and to follow our standard operating procedure for reporting incidents (as is detailed above), it has proved to be a huge administrative burden for teams who are already struggling to cope with the problem of so many trespass incidents. If we were to record every attempted and successful incident of trespass and log it into the Security Logs with an incident report and corroborative photographic or video evidence, it is no exaggeration to say my team

would do nothing but write up reports all of their working day and could not actually be on site trying to deal with the problems that occur, such is the sheer number of incidents we face on a daily basis.

28. Overall, the management staff of Quintain Living, such as the Resident Associates and managers, who are employed to cater to the residents needs and ensure they have a positive experience while living in the Quintain BTR Estate, are now spending a disproportionate amount of time dealing with reporting and escalating incidents of trespass and collating evidence to support the existence of this negative issue and all the associated administrative work involved such as incident report writing, entry into the Whatsapp group and liaising with the security teams.

29. The problem of trespassers gaining access has to the buildings of the Quintain BTR Estate has now become essentially unmanageable. Put simply, there are too many potential entrance exit points to the Quintain BTR Estate and too many persons using them to gain access. As stated above, the security teams are overwhelmed by the sheer number of incidents that take place, more often than not, daily. It is simply not practical to put 24 hour security guards on each and every possible entry point. Even if it were possible, it would create a prison like atmosphere, not the type of environment that the Claimants' tenants expect or that Quintain looks to offer.

30. All this has had a detrimental effect on (a) the residents abilities to enjoy their homes (some tenants have left because of the issue) (b) Quintain's staff due to the threats that have been made against some of them (some staff have said this forms part of their reason for leaving Quintain's employment) and (c) on Quintain's reputation as being a provider of high quality co-living residential accommodation.

31. On 3 June 2023 the issue of trespass reached such a level that a trespasser WhatsApp group was created by a Resident Manager called Faysal including all onsite management staff and security teams to assist with the daily management of trespass by my on-site

teams, there are currently 63 members in the group (the “WhatsApp Group”). I have been a member of the WhatsApp group from the outset. Over time it has become apparent that there are a number of groups of individuals who regularly trespass on the Quintain BTR Estate and our security team uses nicknames such as ‘Jesus’ and ‘gym bro’ when discussing them as part of our constant attempts to thwart the trespassers’ attempts to access the buildings.

32. Given the regularity of these incidents of trespass, staff members, including myself, have built up an understanding of who the regulars are based on recognising their faces, their attire (jackets and shoes particularly as these change less frequently) and their known associates. From discussions with my team, I know that particular groups of trespassers have preferred methods of accessing the buildings and preferred buildings to target and for this reason when one member of the team identifies one or more members of the group on the CCTV they will alert the rest of the team using the WhatsApp Group. This is one of many systems we have evolved to combat the trespasser issue. It has proved to be the only way of keeping track of the “real time” incidents of daily trespass to facilitate the security teams being able to react quickly enough when an incident occurs.

33. The WhatsApp Group is also used to keep the security team for the wider Wembley Park Estate updated of active trespassers and anti-social behaviour. To illustrate its useage, I exhibit two transcripts from the WhatsApp Group one from the first week from 05/06/2023-12/06/2023 at **GB01/06D pages 89-93** showing my team reporting trespassers and the security patrol reacting, locating and evicting the trespassers where possible. I also enclose an excerpt from the WhatsApp group for the week of 06/01/2025-12/01/2025 showing the time and effort that goes into reacting to incidents of trespass across the Quintain BTR Estate enclosed at **GB01/07A pages 94-108**, there are almost 13 pages of messages for just that one week.

34. By way of other general example, I exhibit a report from November 2024 prepared by Petra (Resident Manager) and Rubens (Resident Associate) showing all of the recorded

incidents with photos of trespasser activity within Repton Gardens for the month of November. This shows the extent of the problem at one development within the Quintain BTR Estate in just one month, enclosed at **GB01/07B pages 109-137**.

35. The report was prepared using the information collated on the WhatsApp Group for the purposes of presenting the frequency of the incidents to the board of directors as part of discussions surrounding the decision to permanently lock a set of external access gates at Repton Gardens. These particular gates provided resident access to the private podium gardens and social amenity spaces. Unlike other access points in the building, this gate offered a unique opportunity to be secured without compromising essential entry routes or safety. Other doors cannot be treated the same way due to their functional importance, they are required to maintain general building access and securing them in this manner would conflict with both fire safety requirements and our commitment to ensuring the building does not feel restrictive or prison-like. In this instance, the building happened to have two access points in the same area, allowing us to make this adjustment. It was an important decision to make because locking the gate inconvenienced the residents, as it closed off one of the entrance/exit routes from the building, but in my judgement, it was necessary given the regular trespasser access through the gate. It has not been possible to re-open this access due to the risk of trespass.

36. As Ms Birchley has discussed in her statement, there is now a fixed ten-minute slot within the weekly operations board meeting for the business to discuss and report on issues of trespass. Such is the scale of the problem that it is now a regular weekly executive level issue.

Nature of the trespass - Overview

37. What I would call a “classic example” of the types of behaviour faced by the Claimants is shown in a TikTok video from 24/06/2022 by user @tobymejhat . The video can be viewed

at **[LINK 01]** and still images from the TikTok Video are enclosed at **GB01/07C pages 138 – 140.**

38. This shows an individual within one of the Quintain BTR Estate developments, Canada Gardens, opening, videoing himself with the intention of obtaining unlawful access, obtaining that access and then looking to avoid security once he was inside. He can be shown gaining access to the roof terrace, which is a private space not open to the public and not somewhere he should be. There is no stated purpose in the video for this act of trespass – the impression given is that it is done for fun. However, I have noticed an increasing trend towards more sinister and hostile trespasser behaviour, evidenced by the threats against staff who ask trespassers to leave.
39. This is the sort of activity that happens almost every day at the Quintain BTR Estate. As will be shown below, many of these incidents involve far more antisocial behaviour elements and also damage to property.
40. As described in more detail below, the trespass activity which forms the subject of this claim involves deliberate acts of entry into the buildings by various means. The manner of entry is often identified after the event only by one of my team members reviewing the CCTV footage. Examples of CCTV videos can be viewed using these two links included below.
41. One common method of entry is by tailgating residents through the external doors which have locks that can only be unlocked using an electronic key fob. The system is called Salto and is a typical system used in hotels and is widely considered to be a secure system in the residential property industry, to enter each foyer. Often tailgating will be reported by residents but not always. I enclose some photos showing incidents of tailgating occurring at Landsby at **GB01/08 pages 141 – 148.** A video from the CCTV showing the tailgating can be viewed at **[LINK 02].**

42. Alternatively, trespassers have been seen to physically force the door open either by slamming their bodies against it or using tools to break the inner door mechanism which can be seen on a CCTV video at the link at **[LINK 03]** and **[LINK 04]**. The Trespassers also try to convince a resident to let them in by knocking and by asking an approaching resident, who refuses in this case.

43. Trespassers have also gained access by rushing to catch a closing door before it has firmly closed behind a resident or other lawful visitor who has either used their fob to open the door or been buzzed in by reception staff (for example to admit a takeaway or delivery driver), with the trespassers then holding the door open and allow their friends or accomplices to gain access as is showing in the CCTV video shown at **[LINK 05]**. Other methods include ringing the intercom and covering their faces to gain access and disabling external and internal security mechanisms.

44. Once inside, the trespassers' activities generally involve any or a combination of the following:

- Gaining access to the roof and sitting on the edge of the rooftops outside of the safety railings.
- Congregating in stairwells and corridors of the buildings;
- Smoking, drug use, and alcohol consumption within common parts of the buildings which are for the sole use of the residents. All Quintain buildings are smoke free zones and smoking is only permitted outside of the developments;
- Engaging in threatening or intimidating behaviour towards Quintain staff, residents and other lawful visitors such as delivery personnel;
- Littering, urination and criminal damage to property within the common or other restricted areas of the buildings;
- Damaging fixtures, doors and CCTV equipment within the common or other restricted areas of the buildings.

- Engaging in what may politely be described as “lewd” or sexual conduct within the buildings.

45. The behaviour of many trespassers, as set out in the detailed examples at paragraphs 88-185 below, suggests an element of thrill-seeking as they have been caught on CCTV running through the buildings and climbing on large items in the communal areas, or social media-motivated attention seeking. The CCTV footage often shows the trespassers with their phones out seemingly recording themselves. This is more evident when it's dim lighting and their phone torches are clearly visible such as in the examples at paragraphs 23, 130 and 146 below. Based on my experience of these trespass incidents over the years and having reviewed the CCTV footage and material which is referred to under the specific examples below, and having spoken to my security team colleagues, who are personally involved in removing the trespassers on each occasion, it is my view that many of these trespassers consider it a sport to break into the Quintain BTR Estate. The security teams have reported encountering an obvious excitement among the trespassers and it is my impression that being chased out of the developments presents a 'cat and mouse' style game to them.

46. The individuals concerned are clearly not residents or lawful visitors, based on their behaviour, and they have no permission or lawful authority to enter or remain on the premises. Whilst the age of actors varies, they tend to be youths of school or college age, as is apparent from the photographs referred to below (for example the photos at **GB01/pages 455 and 328**). As mentioned above, there are a number of regular trespassers who I and my teams are now able to recognise by sight, but do not know their names nor do we have any way to identify them.

47. The policy our site teams have in place when removing trespassers is focused on removing them from the buildings without escalating the situation in accordance with the de-escalation training that the security team have all undertaken. In the past my team and I have asked trespassers to give their names, but names have never been given and

the request has tended to inflamed the situation and has often provoked an aggressive reaction from the trespassers. As such, we do not now ask for their names as a general rule and I am not at all confident, based on my experience, that names would be given or that any names given would be accurate.

48. Based on what has been experienced (and as shown on the Graphs (see for example both January and March 2025 where both Landsby and the Robinson experience spikes)) the trespassers often target multiple developments in one 'outing' by trespassing into more than one building on the same day, causing spikes for multiple developments and what I call the "whack-a-mole" behaviour described below.

49. In the first 6 months of 2025, my team have recorded 513 trespass incidents across the Quintain BTR Estate in the 2025 Security Log including the monthly logs for April, May and June. This represents a significant increase over previous years where Quintain recorded 114 in 2023 (with records for two months missing) and 770 in 2024 (12 month period) according to the Security Logs for each of those years. Again, these are only the recorded incidents, not the actual number which I strongly suspect will be much higher because I am sure that some incidents are not logged and others go unnoticed for the reasons mentioned above.

Attempts to enhance security

50. As a result of the ongoing trespasses, the Claimants have enhanced their security presence to try and put additional security measures in place to try and put a stop to the incursions and to deter the individuals involved and the increase in incidents has occurred despite enhanced security measures having been put in place. The additional security measures that have been put in place since 2022 include

(a) The Claimants have replaced and reinforced external doors by having solenoid locks inserted at Ferrum, the Robinson, Madison and Luna. I have also requested approval

to carry out the same project for Canada Gardens and Solar and this should be signed off shortly.

(b) The Claimants have employed significantly more security staff to try and deter trespassers from entering and to ensure that they can be removed quickly as possible. The estimated total cost of the additional security that the Claimants have put in place to date is estimate at around £69,445.94 for additional security personnel costs from 29 Jan 2024 – 29 May 2025. I extracted this information from our accounting software, having filtered out the regular invoices, to show all of the sums paid to Pace Security Services Ltd, who only charge us for additional security personnel over and above the regular contract price. I request additional security on a need-basis, so if there is a spike in incidents of trespass I will react and ask PACE to provide more security guards. If there are multiple hot spots, I will arrange for multiple guards until I see a decrease in the number of incidents. Usually I deploy x1 additional guard with a more restricted patrol radius or fixed position, as an example, there were multiple incidents of trespass at Landsby East, it became a hot spot, so I deployed x1 additional guard to cover the main entrance for a week, in an attempt to stop the incident frequency or at least 'move them on'. I usually have at least one additional security guard at each operational development, so a minimum of 8 additional security guards, with more in response to spikes in trespasser activity.

(c) They have also introduced the use of body cameras and stab vests by security staff and anyone who is confronting trespassers in response to serious concerns about staff safety, including credible threats of violence and the risk of being stabbed. Security personnel had expressed genuine fear for their wellbeing, and we have documented incidents involving trespassers carrying knives. These events highlighted the need for enhanced protective measures to ensure the safety of both staff and residents and to deter aggressive and violent behaviour from trespassers.

(d) They have provided training to support staff members in reactional situations.

(e) As mentioned above, the decision was taken to permanently lock large gate at Repton Gardens to block an easy access route for trespassers to gain access

(f) The Claimants have changed use of doors by removing outer handles, removed door furniture and even closed off doors (where not risk to fire strategy) to decrease the access points.

51. In order to fully prevent trespassers gaining access to the Quintain BTR Estate it would be necessary to have a guard posted on every door and access point on a 24/7 basis. That would require 60 additional guards on duty, 24 hours a day, to cover the 60 doors and 8 lobbies and access points. This would be wholly impractical and unachievable first in terms of there simply being enough security guards available to be trained and retained to meet such a need (recognising that there would need to be enough to cover daily shifts, holidays etc.

52. Second, it would be impractical in terms of cost, see the below calculation of the approximate cost on an ongoing basis and a constant and permanent guard presence.

Detail	Volume
Total number of External Door (excluding the front desk lobbies [8])	60
Hourly rate for Guard with service provider PACE Security (inclusive of VAT)	£20.50
Total days covered (24 hours)	365
Total annual cost	£10,774,800.00

53. Third, such a security presence would create something akin to a prison, which is not what the Claimants residents expect of their home environment, nor is it Quintain's intention when trying to create an attractive place for its residents to live.

54. The buildings on the Quintain BTR Estate already have 2,404 CCTV cameras installed as part of the original development with a further 339 on the wider Wembley Park Estate. I think it's important to note that the CCTV cameras do not cover every inch within the developments and there are parts of the podium that are not in view of a camera. Also the Residents Team are not expected to monitor CCTV 24/7 as they have many other responsibilities and this is often why CCTV is checked only after an incident has been reported or evidence emerges that an incident took place.

55. Additional CCTV coverage for the stairwells in the buildings has been considered by me and my team as a method to monitor trespass incidents. It has been ruled out for a number of reasons. First, as being impractical to retrofit as the requisite wiring was not included in the original build and cameras would be required on every floor or split level to cover the entire area.

56. Second, because of the significant cost, approximately £700 per camera including labour) so for Canada Gardens alone, which has 101 separate floor plates/areas, that would cost £70,700 + VAT and this does not include the infrastructure works required or requisite approvals. I have set out the costs of the cameras alone for each development in the table below and the cost would total approximately £334,640 and that figure does not account for the installation costs, the cost of obtaining the necessary consents or paying a project manager to oversee the project.

Development	Floor plates /areas
CG	106
Landsby	24
Repton	50
Madison	34
Robinson	59
Ferrum	83

Solar	Camera's installed
Luna	Camera's installed
Total	356
Cost per Camera	£940
Total Cost	£334,640

57. Third, there would be a significant increase in annual data costs and licences for storage of footage, coupled with the workload of repairs. Fourth, there are also additional complications in terms of the planning and regulation requirements which makes the exercise of installing additional CCTV cameras more challenging. For example, the core of the buildings is a protected environment and must be fire compliant, which makes it necessary to obtain regulator sign off to carry out works to install the requisite wiring for CCTV cameras. I have been advised that it would be difficult to obtain permission to carry out such a project under the new Building Safety Regulations and such an application could take months if not years to receive consent. Finally, and most importantly, simply increasing cameras would not be likely to prevent trespassers on the basis that they are currently not being deterred from trespassing into areas which already have visible cameras in place, such as roofs, social spaces and podiums.

58. Our current response remains entirely reactive and despite best efforts over the years, it has become clear that nothing we can do (we have no powers of arrest or detention) will be sufficient to prevent continued and escalating trespass activity.

59. Whenever enhanced security has been put in place to date, it has proved to be ineffective and the trespassers have been motivated to find alternative ways of breaking in, such as with the use of tools or items they find nearby. Any measures we have taken have been little more than sticking plasters and nothing has been sufficient to deter the overall level of trespass – indeed it is only getting worse.

60. It is my firm view that the only thing that will stop the risk of future trespass is if an order is granted by the Court carrying a threat of potential personal sanction.

Consequences of acts of Trespass – Harm and Impact

61. The consequences of the trespassers' actions have undermined the security of the Estate and given rise to physical damage to property, disruption to residents and serious concerns for health and safety.

62. The unauthorised access to rooftops within the buildings (many of which are very tall) gives rise to safeguarding issues and has resulted in extreme risk to life, including incidents of climbing on ledges or accessing prohibited areas, being areas which are not accessible by residents as they are unsafe and outside the legal safety guards and/or within plant or maintenance areas.

63. I exhibit a photo taken on 18 October 2024 showing what appears to be young teenage or school age children on a roof top with one of them sitting dangerously on the outer edge of one of Quintain's first generation buildings, known as Alameda at 30-46 metres above ground level **GB01/09 page 149**. This shows that the trespassers have been accessing restricted areas and there is a clear risk that uncontrolled trespass of the kind that is being experienced will involve trespassers putting themselves and others at risk.

64. The ongoing trespasses also undermine the security and reputation of the Quintain BTR Estate which provides private residences and associated amenities which are supposed to be secure and exclusive to the residents and their visitors. The deliberate encroachment by unauthorised individuals into that private space creates a sense of insecurity, diminishes the quality of the offering and the incidents have caused serious distress and alarm to our residents, many of whom are families with young children. The sanctity and security of the private residential space is exceptionally important for

residents and families and provides a respite away from the external world. I am obviously concerned that the ongoing break-ins and the presence of unknown trespassers will continue to cause unease, disruption, insecurity, a sense of vulnerability and generally adversely affect the ability of residents and their visitors to enjoy the occupation of the Quintain BTR Estate as their home.

65. Several residents have chosen not to renew their leases and to leave the Quintain BTR Estate, citing concerns about security in their exit questionnaire and the repeated intrusion of unauthorised individuals as a key factor.

66. I exhibit a schedule showing 27 examples of residents who terminated their tenancies since 2023 with Quintain and gave reasons in their exit questionnaires that they had concerns around safety enclosed at **GB01/10A pages 150-152**. I must point out that these only reflect those who were willing to specifically document this reason on departure but given the extent of the problem, it is quite clear to me that the trespass issue has been a significant factor in residents' decisions to vacate and I believe the number is far higher in reality based on the conversations my colleagues have had with residents which they have reported back to me.

67. Quintain's Resident Team, made up of the Resident Associates and managers, produced the Retention Surgery document at the end of the first quarter of 2025, to explore the reasons residents are vacating Canada Gardens, Ferrum, Landsby, Luna, Madison, Repton Gardens and the Robinson and to look for solutions. Occupancy is the most important statistic, so ultimately, we have to keep residents happy, so they love where they rent. Being 'Unhappy with the Area' is the second highest reason that residents have given for leaving and *"the feedback is themed on security concerns with residents primarily frustrated with tailgating or security incidents"*. This document is enclosed at **GB01/10B pages 153-168**.

68. Residents have made multiple complaints to the resident managers at Quintain regarding safety concerns caused directly by trespasser activity and I enclose 12 examples of complaints lodged directly with Quintain either via its complaints logging system and by email to the residents' team at **GB01/11 pages 169-185**.

69. Residents have also left negative reviews on online review platforms including the six Trust Pilot reviews posted between 20 May 2023 and 20 April 2025 enclosed with this statement at **GB01/12 pages 186-191** which emphasise the breaches of security as follows:

- *“Failure to provide essential safety and security for residents. There have been multiple incidents of tailgaters coming into apartment buildings and staking women/harassing them”*
- *“there are other factors that have led us to realize that living conditions have changed from what we initially enjoyed, such as security concerns (including two incidents where strangers from outside entered our neighbour’s apartment and instances of bike theft from the bike storage area).”*
- *“Doesn’t help you when you are in danger, and there are babygangs accessing the building; they smash and break whatever they can. They try to force themselves into the flats and Quintain since November 2023 is not DOING ANYTHING AT ALL TO AVOID THIS.”*
- *“Canada gardens have had several trespassers, security breaches, tailgating kids and police involvement incidents, stolen packages..”*
- *“I am concerned about the security in Repton Gardens. Multiple people have reported random people wandering around the complex who have just wandered in from the street. This a worrying security issue that needs to be addressed.”; and*
- *“SAFETY TOO IS A CONCERN. They let trespassers get away. Security only lasts 2 days then they’re gone.”*

70. The Retention Surgery document also identified and collated external reviews and security is the highest theme for negative feedback with the following comments being given as examples

- “numerous concerns around the anti-social behaviour of youths in the area as well as entering the building too easily”
- “*tailgating into buildings and challenges with confrontation & drugs. Not feeling comfortable going into social spaces*”; and
- “*Feels like [Quintain] does not acknowledge how important security is*”.

71. For the avoidance of doubt, I do not accept the characterisation or suggestion that insufficient effort has gone into providing security. As set out at paragraphs paragraphs 49-59 above, enhanced security measures have been put in place since 2022 but the trespassers are motivated and intent on evading the security systems which makes it impossible to prevent them by means of security systems alone. Also residents do not always see the measures that are undertaken, and it is easy for them to focus on the persisting issue rather than what we have tried to do to resolve it.

72. Thankfully no resident has been directly physically harmed to date, to my knowledge, but there has been intimidation of staff, incidents of damage to property and residential doors have been kicked. There is an obvious risk of future harm to staff, residents or their visitors and to property if unauthorised access by unknown individuals continues undeterred.

73. In addition to the financial and unquantifiable reputational costs to the Claimants of losing residents and having increased turnover of residents, there is a significant financial cost to the business in trying to prevent the encroachments in the form of increased security (as set out above) and on dealing with the frequent repairs and remedial work resulting from trespass-related damage.

74. For instance, on 12 February 2025 the cost to repair the flatscans for the automatic doors at Landsby after they were forcibly broken by a trespasser was £1,309.01. I enclose this invoice at **GB01/15 page 213** as referred to again below.
75. In addition to reactionary costs to repair damage, I have authorised proactive steps to upgrade the locks across the Quintain BTR Estate to reinforce the doors against being forced open by trespassers. For example, on 16 April 2024 the cost of installing a new solenoid lock in one of the fire doors in Canada Gardens was £1,750 plus VAT and I enclose a Safe System Invoice No. INV-3545 dated 16 April 2024. I enclose the aforementioned invoice at **GB01/13 page 196** and similar invoices for solenoid locks for Alameda, Luna, Madison and the Robinson enclosed at **GB01/13 pages 192 – 197**.
76. Quintain has a highly skilled maintenance team that I liaise with on a daily basis in order to repair the damage caused by these trespass incidents. As an example, the motorized doors (which have to be automated for disabled access) include a flat scan which is the sensory system to prevent the doors closing on a person and hurting them. When the doors are forced open this scan sensory system is broken and an electrical engineer is required to do the necessary repairs to the motors and the parts can be bought in, such as the replacement arms. However, the doors should have a significant lifespan of several years' of use before they break and/or require repair, but due to trespassing, we are seeing that far more frequent and early onset repairs are needed. I have enclosed a copy of a maintenance spreadsheet that the maintenance team uses to track tasks (the "Maintenance Schedule") at **GB01/14 pages 198 – 206** because this shows the huge numbers of door repairs that have been carried out.
77. It is worth noting that the team have logged 267 cases of doors requiring attention or repairs following trespass action, in the Maintenance Schedule for 2025 already, 5 months in, that is already more than the 2024 total.

78. In my experience of liaising with the maintenance team to arrange for the doors to be fixed, most quick fixes would take around an hour, anything more complex is around a 1 to 2 hours to fix and require admin time to organise parts. Therefore, in effect, in 2025, the maintenance team have spent around 375 hours on door repairs in 2025 (159 were fixed within 5-hours of reporting and 108 took longer than 5 hours to resolve), that's effectively 47 full days of door repairs in 2025, an average of 2 days a week allocated to one member of the team repairing doors.

79. Overall I would estimate the cost to maintenance and security attributable to trespass to have reached £83,335.13 per year in 2024 and I ascertained this figure by adding the cost of additional security and the cost of carrying out maintenance works to the doors damaged or broken by trespassers.

80. In some cases Quintain's Maintenance Team have been unable to fix doors or replace parts that have been damaged or broken by trespassers so external contractors have been required to carry out the necessary repairs and replacements. I enclose 9 invoices relating to the cost of damage repairs carried out by external companies across the developments and a schedule detailing examples of the damage caused by trespassers and the cost of remedying that damage in Robinson alone at **GB01/15A pages 207 – 216**. I also enclose a schedule at **GB01/15B pages 217 and 218** showing the costs of repairs to doors and CCTV equipment by SAFE System (UK) Limited, totalling £81,625.53 (the "External Repairs Schedule"). All of those repairs were required due to damage caused by trespassers

81. These intrusions and associated damage caused to the doors , including the frames and locking mechanisms, have also compromised fire safety by rendering emergency exits insecure which poses a real and imminent danger to the health and safety of residents. Consequently this risks puts the Claimants in breach of statutory rules and regulations relating to fire safety for high rise buildings until the necessary remedial action is taken.

82. James Griffin, the Head of Safety and Estate Projects at Quintain has assessed and highlighted those risks in his email dated 8 May 2025 at **GB01/16A page 219:**

“Impacts on fire safety notes:

The nature of trespass incidents, whilst raising several security and resident safety concerns, does cause potential issues when it comes to Fire Safety within the affected buildings.

Where doors are damaged, including the frames and locking mechanisms, this has the potential to create an unsafe fire defect, whereby a fire door may not function as intended in the event of an emergency. This could be as final exit door leading to a place of total safety outside the building, or a door forming part of an escape route or to a place of relative safety inside the building such as a refuge point. It could create issues with a buildings compartmentation, and its evacuation strategy and evacuation management plans.

Where these doors are identified as, or found to be, faulty they are repaired and reinspected as soon as possible, at a cost to the business. Sometimes the damage can be of such significance, that a simple repair may not be suitable and a whole door set (frame, door and door furniture) may need replacing.

With the increased Regulatory requirements placed upon our business by mechanisms such as the Building Safety Act, and the need to ensure Residents are safe in the homes, but also safely able to evacuate should the need arise, this hazard, created by the trespass incidents, adds further risk, complication and cost to our organisation.”

83. We have also sustained damage to rooftop access doors, surveillance equipment, fencing, fire doors and other security infrastructure.

84. As a result of the damage and risk of future incursions, we have had to restrict access to our own residents to some of the resident amenities, including roof terraces and lounges, to prevent further trespass, which has compromised the offering we are contractually obligated to provide and causing tenants to raise complaints about the lack of amenity.

85. To be clear, this has meant closing roof terraces, closing communal areas and in respect of Repton Gardens, we have closed off an external entrance to one of the buildings

because it proved too difficult to keep secure and this has resulted in residents losing the amenity of a cut-through short cut to access their apartments and the common garden of the building.

86. The ongoing issues, which adversely affect residents and have resulted in complaints and negative reviews as set out above, give rise to obvious reputational risks to the Quintain BTR Estate, which undermines marketing and tenant retention efforts.

87. The incidences of trespass have also taken a toll on members of staff at Quintain and has led to staff departures. My colleague Jackie Doherty, Senior HR Business Partner, has shared with me the following three excerpts from confidential exit interviews given by members of Quintain staff's at the end of their employment which are extracted below and which demonstrate that there has been a serious issue with safety from trespassers over the past few years which has a negative impact on the workload of individual members of staff at Quintain as well as on the business as a whole **[GB01/16B pages 220-222:**

Exit Interview July 2023

- *"Serious issue with safety of RAs from trespassers, took the business too long to address this issue and still does not feel fully resolved. Appreciate that Russell added security onsite, more needs to be done."*
- *"There should be more security for the RAs, only after two incidents with trespassers was something done, took too long for this issue to be addressed, Russell was helpful with this matter and appreciate that he took it seriously."*

Exit Interview September 2024

"The other thing for improvement is the trespassers situation, I think particularly in the Wembley area among kids (walking into the building, watching TV etc.). To prevent that the possible solutions:

- *Authorisation on the door*

- *More security around*

Security is a very important point and a major concern for residents to be safe in the building and around the area.”

Exit Interview June 2025

“On a serious note, the increase in trespasser is the bit I did not enjoy the most, we have had 4 incidents today (Friday 6th June). Especuially (sic) as we go into peak, the moment a trespasser comes in, everything else stops as you have to focus on what’s happening on the CCTV, gather information for the incident report. I am constantly checking my phone when I leave until 8pm as I am conscious that there is someone on the desk on their own, I will do this until 8pm when the night team come in.”

88. I am seriously concerned that members of my teams, that are required to assist with combating the problem of trespassers gaining entry to the buildings and carrying out anti-social activities, may wish to leave and go elsewhere because of the stress and anxiety caused by the constant confrontations with these trespassers.

Trespass – examples of specific incidents

89. I now set out in detail a number of specific incidents of trespass. These incidents have been selected on the basis that they are a representative sample of incidents for which we hold evidence and which show the range of activities across the Estate as a whole in the past year or so. These are all incidents that have been recorded in the Security Logs. Again, I repeat these are only some of the incidents that have occurred, the real number is far higher.

90. I have grouped these by reference to each development within the Quintain BTR Estate, and by chronological order within each development. As can be seen from the summary, all the occupied and operational buildings within the Quintain BTR Estate are effected by this problem, and are therefore always at risk, all of the time.

91. The relevant entries and photographs for each incident are exhibited and the number in square brackets by each date show the page number in the relevant exhibit to refer to.

Buildings NW07/08 – Landsby - highlighted in pale pink on the Plan – the documents referred to are exhibited at **GB01/17 pages 223 – 287**.

Example A1 – Lewd behaviour in Landsby East Lobby on 08/12/2024 **GB01/17 page 225-232**

92. The information set out below derives from an incident report which has been prepared by Emilia Della Corte, the Assistant Resident Manager, after the event based on the incident report at **GB01/17 page 225-230** and entry in the Security Logs which were prepared contemporaneously by Ms Della Corte.

93. On 08/12/2024 at 06:50, three individuals who appeared to be one male and two females, and who appear to me, from viewing the CCTV footage (photos enclosed at **GB01/17 page 231-232**), to be underage and non-residents, gained access to the Landsby East lobby area by using the intercom system while covering their faces, and were let in through the main entrance for Landsby East.

94. Once inside, they were seen sitting on the lobby sofa, and shortly after, two of them moved toward the mailbox area and engaged in lewd and sexual behaviour, namely oral sex, briefly pausing when a resident entered. They remained in the lobby until around 7:40 AM, when PACE Security arrived and escorted them out. The incident was not reported by staff or residents and was only discovered later through CCTV footage during a trespassing review. There was no physical damage, and the area was cleaned and disinfected by onsite cleaners. No facilities were closed, and the incident was reported to the police, who advised that no further action could be taken as the individuals were not caught committing an offence and the interaction appeared consensual.

Example A2 – Attempted arson on 25/02/2025 **GB01/17 pages 233-251**

95. The information set out below derives from an incident report which has been prepared by Maahir Abdillahi after the event based on the incident report and entry in the Security Logs which were prepared contemporaneously by Maahir Abdillahi, the Landsby Night Security/Concierge **GB01/17 pages 234-244**. I have also seen the images from the CCTV footage and pictures are enclosed at **GB01/17 pages 245-251**.
96. On 25/02/2025 between 20:20 and 21:47, a known group of five trespassers gained access to the Vista lobby area, Vista is one of the buildings within the Landsby development. I recognised the group as being repeat trespassers having seen them on CCTV footage many times. This particular group is the groups of repeat trespassers described at paragraph 46 above.
97. After two failed attempts to force open the main door to Landsby East, they succeeded on their third attempt by forcing entry through the adjacent Vista building, which also forms part of the Landsby development. Once inside, they moved to the ground floor stairwell where they were smoking cannabis according to Mr Abdillahi who attended the scene shortly after they left and reported the smell of cannabis.
98. A fire alarm was triggered, prompting a response from security, who found burned materials including a poster that had been removed and set alight. The individuals fled the building upon the security's arrival. Only minor fire damage was reported, limited to the burned poster which is almost certainly due, in my view, to the early detection and quick reactions of the on-site team otherwise it would have likely escalated into a more serious incident. Other than the cost of replacing the poster there was no additional property damage or repair costs. My biggest concern is the fact that the trespassers deliberately burned a fire action notice poster, as it demonstrates their willingness to engage in (and an apparent escalation in their) destructive behaviour and a disregard for

fire safety. The poster notice that was burned is a legal requirement and was replaced as soon as possible after the incident.

99. No facilities were closed, and the incident was reported to the police under reference number 01/7205072/25. Having seen messages from my colleagues in the WhatsApp Goup, I know the same group was evicted three times that evening from other buildings across the Quintain BTR Estate.

Example A3 - Trespassers Threatening the Night Team and Resident on 18/03/2025 **GB01/17**
pages 252-261

100. The information set out below derives from an incident report which has been prepared by Abdikarim Mohamed (PACE security) at **GB01/17 pages 252-357** after the event based on the incident report, the entry in the Security Logs and the images taken from the CCTV footage, which captured the entire incident and enclosed at **GB01/17 pages 358-261**.

101. On 18/03/2025 between 21:00 and 23:00, a large group of teenagers, whom I recognised as repeat trespassers from previous CCTV footage, gained access into Landsby West by entering through the Vista Building and forcing entry. After getting inside, they confronted the on-site security guard and were removed.

102. Two members of the group returned about two hours later and gained access to the reception area, one wore a mask and verbally threatened the guard, asking what time he finished work and saying he would wait outside to stab him. PACE Security responded quickly and removed them from the building. There was no physical damage or cost for repairs, but the security guard was left feeling extremely uncomfortable and fearful. No facilities were closed.

103. Mr Mohamed reported the incident to the police due to the nature of the threats, and they advised the guard not to patrol outside. Police arrived at around 2:00 AM but said there was not enough evidence to take further action, despite CCTV footage being available. The security team informed me that the same individual who made the threat returned the following night with another person and was found by the Night Team smoking cannabis in the stairwell inside the building.

104. A knife was discovered a week later on the roof, by a contractor which was assumed to have been brought into the development by a trespasser. Shortly after the incident I introduced a policy for security guards to wear stab vests as a direct result of this incident and others of its nature, such as a similar incident a few months ago where Nuno, another member of the security team, was threatened by a trespasser and told he would be “dealt with” when he finished work. I gave both Mr Mohamed and Nuno some time off following each incident given the severity of the threats made and in order to ensure their safety in the aftermath of threats of violence.

Example A4 - Knife Discovery on 25.03.2025 **GB01/17 pages 262-270**

105. The information set out below derives from an incident report which has been prepared by Madalina Puscas after the event based on the two incident reports, the entry in the Security Logs and the photos I have seen. Pictures and location of knife were also given to Cesar Alvare at the time who reported it immediately to Fire Marshall via the WhatsApp Group.

106. On 25/03/2025 at 11:25 a hunting knife was discovered by a City Abseil contractor called Mick and this was brought to my attention on [date by whom?]. He found it concealed in the rooftop plant room area on Level 13 of the Vista Building, within the Landsby demise. The item was found by Mick as he was carrying out a job for Quintain on site. I do not know who brought it in, and there’s no CCTV footage or evidence showing how access was gained. We no longer have access to old CCTV footage and when we looked at the time it was found there was no obvious footage of the incident. However,

given the nature of the item and the fact that it was hidden in an area not generally accessible to residents, it strongly suggests it was left there by a trespasser. I am aware of incidents of trespassers climbing up and gaining access to prohibited areas similar to the Vista plant room and I include some of those examples within this statement. Trespassers have made threats to stab members of the security team which is another reason I believe that some of them carry knives. This discovery has made me worry even more about the safety of my team.

107. No suspects were located or removed at the time. There was no property damage and no costs incurred. No facilities were closed or disrupted. The weapon was immediately and safely removed to eliminate any risk to residents, staff, or visitors. Madalina Puscas reported the incident to the police, and a CAD report remains open under reference number CAD3052/25Mar25.

Example A5 – Aggressive behaviour, kicking door of Apartment 801 **GB01/17 pages 271-277**

108. The information set out below derives from an incident report which has been prepared after the event by Emilia Della Corte, the Assistant Resident Manager on 12 April 2025, the entry in the Security Logs and the complaint email received by Quintain Living from the resident of Apartment 801. This incident was brought to my attention on 9 April 2025 following the email complaint from the resident. I also received the handover report from the PACE security which provided their account of the incident.

109. On 08/04/2025 at 20:24, two unidentified male teenagers, presumed to be non-residents by the security team present and by myself having viewed the CCTV footage at the time, gained unauthorised access to Landsby East by tailgating a resident. I saw footage of them from the CCTV cameras at the time and clearly recall the incident but unfortunately this was not saved before it was automatically deleted due to Quintain's

privacy policy. The security team also identified the individuals as being teenagers in their report of the event.

110. I would guess that the trespassers gained access by forcing the fire exit door and used the stairwell, which does not have CCTV, to reach the 8th floor because this is a common means of access for trespassers and a door that was found to be damaged. They then began aggressively kicking the door of Apartment 801 in what appeared from the CCTV to be a targeted and deliberate act. About eight seconds later, the resident of that apartment arrived via the lift, prompting the trespassers to flee down the stairwell. They attempted to exit through the main lobby but were intercepted and removed by PACE Security. No physical damage was reported, but the resident was understandably alarmed and contacted the onsite team to report the incident by email the following day. The resident explained to the team that she had refused to allow the trespassers entry when they sought to tailgate her and that was the reason she was targeted and her door attacked once the trespassers managed to gain access by tailgating another resident.
111. No facilities were closed, but security presence at Landsby East was increased for an extended period following the incident. The police were not contacted, as the situation was handled by on-site security.
112. I have enclosed a copy of the resident's email at **GB01/17 page 277** describing the incident as *"deeply concerning and frightening"* and went on to say *"This incident has left me feeling alarmed, unsafe and extremely concerned about the security within the building. It is deeply worrying that unauthorized individuals could gain access to residential floors and behave in such an intimidating and potentially destructive manner right outside my home."* This email shows how upsetting the incident was for the resident and how such an event immediately erodes residents feeling of safety on the Quintain BTR Estate. Obtaining this injunction is the first step towards building back the residents trust in Quintain's ability to keep them safe.

Example A6 - Trespasser Sleeping in Stairwell **GB01/17 pages 278-286**

113. The information set out below derives from an incident report which has been prepared by Abdikarim Mohamed, the PACE Duty Manager, who was the night concierge that evening after the event based on the incident report, the entry in the Security Logs and the photos taken by Mr Mohamed.

114. On 12/05/2025 between 3:00 and 4:00 AM, a male trespasser was found in the Level 9 stairwell of Landsby West by night security during their patrol. The individual appeared to be under the influence of alcohol or drugs according to the reports from Mr Mohamed, who said he seemed unsteady on his feet so he offered to call ambulance for him but he declined. There is no available footage, so it's unclear how he gained access. PACE Security removed and escorted him from the premises. No property damage was reported, but the stairwell required deep cleaning including the removal of rubbish left by the trespasser. No facilities were closed or disrupted. Following the incident, PACE Security carried out inspections on each floor to ensure no other trespassers were present. The police were not involved on this occasion because the trespasser was compliant and agreed to leave.

Buildings NW09/10 – Repton Gardens - highlighted in dark green on the Plan - **GB01/18 pages 287-392**

Example B1 – Club Room Criminal Damage **GB01/18 pages 288-292**

The information set out below derives from an incident report which has been prepared by Madalina Puscas, Quintain Living Assistant Development Manager, after the event based on the contemporaneous incident report at **GB01/18 pages 289-290**, the entry in the Security Logs and the photos taken from the CCTV footage which I have seen.

115. On 23/10/2024 at 20:00, three trespassers, who all appear to be teenagers from reviewing the CCTV footage, gained access to the Club Room by tailgating residents through the Aspen House gate, crossing the Podium Gardens and then forcibly entering through the Clubroom Podium exit into Club Room West (kitchen side). The use of force to enter the building clearly shows that they were not residents. I know this was the point of access from the CCTV footage I saw at the time and because the door exhibited signs of damage after having been forced open repeatedly, which caused the mechanism to not function correctly.
116. Once inside, they are visible on the CCTV footage smoking indoors and playing with the pool cue and I enclose two photos from CCTV showing . I include photos taken from the CCTV at **GB01/18 pages 391-392**. The Fire Marshall reported that the individuals were playing pool and vandalizing property including the pool table and equipment and exhibiting destructive behaviour. They broke a pool cue and stole both the black ball and cue ball.
117. The Fire Marshal escorted them off-site via the Aspen House entrance. The damage included the broken pool cue, missing pool balls, and further damage to the Aspen House main entrance door due to the forced entry. The total cost was around £100, but the impact was greater as the pool table—a key feature of the Club Room—was out of use for about four months, affecting bookings that are typically £50 per hour. The television remote also went missing and it is assumed that this was also taken by these trespassers so it was replaced. Their actions demonstrated a blatant disregard for community safety and respect.
118. In response, the door was reinforced and Wembley Park Control stationed security guards around the gate. The incident was reported to other developments, as the same group attempted to re-enter multiple times that day. Police were not involved, as the trespassers scattered once additional security arrived.

Example B2 – Damaging doors and use of the Clubroom **GB01/18 pages 293-297**

119. The information set out below derives from an incident report which has been prepared by Emmanuel Acquah after the event based on the incident report enclosed at **GB01/18 pages 294-5**, the entry in the Security Logs and the enclosed photo taken from the CCTV showing the individuals sitting in the club room and the damage at **GB01/18 pages 296-297**.
120. On 06/12/2024 at 20:54, four young people, who appeared to be teenagers dressed in all black, gained access to the Club Room East by tailgating residents through the Aspen House gate and entering via the podium level. They were reported by residents and removed by the Fire Marshal after the Front Desk team was alerted through the WhatsApp Group chat. The Fire Marshal escorted them off-site via the Aspen House entrance.
121. The incident caused damage to the maglocks on both the Aspen House main entrance and the Club Room East door facing the podium, which had been forcibly pulled. The Communal Maintenance team replaced both maglocks, with the total cost for parts and labour coming to approximately £1,200. The Aspen House door to the podium was out of service for about three months during repairs because there was a delay in obtaining the relevant parts required, which caused frustration to residents who complained because it was a key access point to the outlet and supermarkets.
122. A full Pardot message (being an email sent to all residents using the Pardot software plug in or salesforce (crm) which allows us to send development-wide emails to all residents) was sent to all residents explaining the situation and the steps being taken by my team to combat the incidents of trespassers gaining access to the buildings. Additional security was also stationed at the gate adjacent to the lobby door by Wembley Park Control. Although the trespassers were removed by the Fire Marshal, the police were not contacted in this instance.

Example B3 – Harassment of Resident in Apartment 1804 GB01/18 pages 298-314

123. The information set out below derives from an incident report which has been prepared by Emmanuel Acquah after the event based on the incident report, the entry in the Security Logs, the complaint email received from the resident of Apartment 1804 and the enclosed photos taken from the CCTV showing the individuals waiting outside the fire entrance, using the intercom to attempt to gain entry, entering the social spaces, approaching Apartment 1804 and proceeding to knock and kick on both the door for 1804 and the apartment opposite. There is a 3:11 minute video taken from CCTV footage which shows all of the above activity and can be accessed using the following **[LINK 06]**. I enclose 15 images taken from the CCTV footage showing this behaviour. It is also clear from at least 2 of the photos that the trespassers are filming themselves and each other whilst they harass the resident inside Apartment 1804.

124. At approximately 18:57 on 07/12/2024, unauthorised individuals who, look from their appearance to be underage and likely teenagers, were captured on CCTV gaining access to the premises. They proceeded to aggressively knock on the door of Apartment 1804 using their hands and feet, acts which evidently distressed the resident inside. The trespassers issued verbal threats before being confronted and escorted off the premises at 20:00, upon the arrival of the night team. The incident left the resident shaken and raised serious concerns regarding building security.

125. The residents of Apartment 1804 sent the following report to Quintain sent by email to Petra Sevcovicova psevcovicova@quintainliving.com (enclosed at GB01/18 pages 183-185) :

"Hello Petra,

We currently reside in 1804 Repton Gardens and want to speak about an incident that occurred on Saturday 7th December, just before 8pm.

A group of 5 men were banging on our door on two occasions, and the second time was much louder as they were kicking at our doors - picture attached of their footprints.

[image: image.png] [enclosed at GB01/18 pages 314]

We were extremely alarmed and disturbed by this, as the door was shaking and we could hear them outside in the corridor of the floor for a while. We immediately called security and they were escorted out of the premises.

Through the peephole, we could see 2 men dressed in all black - but upon calling the concierge, we can confirm that it was a group of 5 men.

We have spoken at length with the concierge at the time as well as the night security. We would like to clarify a few things:

1. We were told that this has happened before, and the same group of individuals came to Repton Gardens the previous day to use the pool table at the clubhouse, however on the day of the incident, the club house was booked, so they decided to go around and bang on specifically our door. We were told that this was not a targeted incident as this has happened before across other buildings - can you please provide confirmation of this?

2. Would you be able to provide CCTV footage of this incident to ensure our safety?

3. What measures or actions have you taken to ensure individuals like these do not enter the building again? There are various points of security with the FOB (including the club house and the entrances to the lift) - how did these individuals get through these points of security and how can you mitigate such cases happening again - as this is a cause of our concern.

4. I also want to give some feedback regarding the security measures of Cherry House Repton Gardens. Once someone comes into the main door, the door remains open for a long period of time. If no one is at reception, this can cause random individuals to enter the building. Moreover, the door to the lifts next to the reception does not have any security measures, and anyone can enter the building without a FOB. Please can you reactivate the scanner, as this is currently a great cause of concern.

We were told that a case will be built against them to the police, has this been done?

Please do let us know as soon as possible as we are concerned and disturbed by this occurrence and don't want this to happen again.

Many thanks,

Aish, Riyaa and Sejal (residents of 1804 Cherry House)”

Example B4 – Occupying Club Room West and the Podium Gardens GB01/18 pages 315-318

126. The information set out below derives from an incident report which has been prepared by the Night Team after the event based on the incident report, the entry in the Security Logs and the photos taken from the CCTV footage.

127. On 20/03/2025 at 21:42, two trespassers dressed in all black, who appeared to be of school or college age based on CCTV footage, gained access by tailgating residents through the Aspen House gate, crossing the Podium Gardens, and forcibly entering through the Clubroom Podium exit into Club Room East. They were reported by a resident working in Club Room West, and Night Shift Security responded quickly, escorting them off-site via the Aspen House entrance. The trespassers were inside for less than five minutes, and no damage or associated costs were reported. The Aspen House main entrance remained operational. Following the incident, the door was reinforced and additional security was stationed at the gate by Wembley Park Control. The event was also reported to the Resident Day Team via the handover, with timestamped CCTV footage provided for further investigation. The police were not contacted, as the trespassers were removed before any escalation. The breach occurred during off-hours, meaning after 8pm so the Night Team are on duty, and posed a serious risk to resident safety. Fortunately, the night security team intervened quickly and successfully removed the intruders from the premises at 21:42.

Example B5 – Smoking in the Club Room GB01/18 pages 319-325

128. The information set out below derives from an incident report which has been prepared by Adnan after the event based on the entry in the Security Logs and the four images enclosed.

129. On 23/03/2025 at 13:31 and again at 15:00, four teenage trespassers gained access by tailgating residents through the Aspen House gate, crossing the Podium Gardens, and forcibly entering through the Clubroom Podium exit into both Club Room West (kitchen side) and Club Room East (lounge side). They were clearly not residents, both because they were visibly underage and looked like teenagers from the CCTV footage I have seen and because they were smoking, playing pool and filming themselves inside the clubroom. I can see from the four photos that they were clearly treating the space as their own.

130. Residents reported them to the Front Desk Concierge around 13:31, and following procedure, the Fire Marshal and Estate Security were alerted. The Fire Marshal escorted them off-site via the Aspen House entrance. However, the group returned around 15:00 and again forced entry before being removed a second time. The Aspen House main entrance was damaged due to repeated forced access, though it remained operational as it is a key entry point for residents. Details of the cost of repairing the doors is in **GB01/15B pages 217 and 218**. In response, the door was reinforced and additional security was stationed at the gate by Wembley Park Control. The incident was also reported to other developments, as the same group attempted to re-enter multiple developments across the Quintain BTR Estate during that day. Police were not involved, as the group scattered once additional security was in place.

Example B6 – Criminal Damage to Doors **GB01/18 pages 326-339**

131. The information set out below derives from an incident report which has been prepared by Petra Sevcovicova after the event based on the entry in the Security Logs, and the twelve pictures from the CCTV footage which I have seen and enclose.

132. On 15/05/2025, six teenage trespassers, based on their appearance in the CCTV footage I have seen and on the reports from my colleagues, gained access through the Aspen House main entrance and made their way to the quiet communal area via the podium. They had initially come from the Landsby building and forced open the Aspen House entrance, again damaging the maglock.
133. Scott McCormick, the Security Lead at Wembley Park Control, confronted them and delayed their movement to allow CCTV to capture clear images of their faces. The group then split up and ran into the podium garden via the stairs, attempting to access Cherry House through the gym, clubroom, and quiet area exits. They forced open the door and exited through the main entrance at Cherry House Concierge. The group ultimately left the Quintain BTR Estate of their own accord having been pursued by security multiple times that day. The incident resulted in damage to the maglocks at both the Aspen House main entrance and the quiet communal area, which I believe will need reinforcement again. Details of the costs for maglock replacement are set out in **GB01/pages 192–197**. No facilities were closed. A CCTV call was made to the police to log the incident under CAD number 4462, and the Resident Team was alerted by Scott.
134. I understand from the Security Log that the trespassers in question had previously been evicted from the Robinson earlier that afternoon having caused damage inside one of the caravans. The report made by my colleague Violet in the Security Log explains that despite being caught by the police after carrying out criminal damage in the Robinson, the trespassers were released without arrest because they were not carrying anything illegal. Although I understand a grinder, presumably for drugs, was confiscated by the police.
135. It is my strong belief that until these trespassers fear recourse by entering on to the Quintain BTR Estate, they will continue to do as a form of entertainment.

Buildings E01/02 – Madison - highlighted in pale lime green on the Plan - **GB01/19 pages 340-364**

Example C1 – Podium Incident **GB01/19 pages 341-347**

136. The information set out below derives from an incident report which has been prepared by Antony Urena, a Security Guard, after the event based on his own recollection, the Security Logs and the CCTV footage. I have also seen the CCTV footage myself.

137. On 23/01/2025 at 19:40, three trespassers, who looked school-age from the CCTV footage I saw, gained access to the building by tailgating a delivery driver through the Madison East entrance. As they walked through the lobby, night staff asked them to show their fobs to confirm residency, but they ignored the request and continued into the building. They accessed multiple areas, including the podium BBQ area, where they defecated in the communal space and used fire blankets from the podium garden to cover the faeces. They left the premises without intervention. The incident resulted in the need to replace three fire blankets at approximately £22 each, along with additional cleaning. No facilities were closed, no specific follow-up actions were taken, and the police were not involved.

138. I understand from my colleague Shane that he spotted their first attempt at entry to Madison and thwarted the trespassers but the above incident was a later attempt where they successfully gained access.

Example C2 – Aggressive Trespassers Intimidating Staff **GB01/19 pages 348-354**

139. The information set out below derives from an incident report which has been prepared by Maria Padilla after the event based on the incident report, the entry in the

Security Logs by both Jayvi Nayee, an Operational Support Associate, and Maria Padilla respectively.

140. On 10/03/2025 at 11:55 and again on 11/03/2025 at 19:27, two trespassers (who Ms Padilla confirmed were the same people on both occasions, as set out below) gained access to the building through the Main Entrance. On the first day, they forced the door open by pulling against the maglock until it was forced open, they gained access as the team member was away from the reception desk at the time and on the second day, they tailgated a delivery driver who was buzzed in by Ms Padilla without realising the trespassers were waiting behind him to tailgate.

141. When approached by Mr Nayee, a member of the Security Team, on the first day they became verbally aggressive and intimidating. Mr Nayee logged the following account:
“I heard noise and commotion happening outside of the Resident Manager office on Upper Ground Floor, so I decided to step out to investigate where the noise is coming from as we do not have any CCTV cameras located on the corridor, so it couldn’t be checked remotely. As I opened the door, I saw two individuals who I immediately identified as trespassers. Upon seeing me, they took two to three steps towards me in an aggressive manner shouting ‘I live here’. As I did not have my phone with me at that moment, I called my colleague downstairs and asked her to contact security. She confirmed she would do so. As the trespassers moved downstairs, I was able to observe them from an upper barrier point overlooking the area. I noticed that they walked toward my colleague aggressively. However, when she informed security that the individuals were present at the desk, they immediately pressed the button to exit the building and left.”

On the second day, the trespassers’ behaviour escalated, and they were again aggressive toward Maria Padilla, who had to remove herself and nearby residents from the reception area to the staff welfare kitchen out of concern for their safety. She logged the following account of the incident:

“While at the reception desk, speaking with two residents near the parcel room, the doorbell rang. I checked and saw it was a delivery driver, so I opened the door to let him in. However, as he entered, a group of people followed, including the two trespassers from the previous incident.

As soon as they entered, one of them said, “There she is.” Although I could not identify exactly who spoke, I noticed one of them staring directly at me. Based on security footage, they then attempted to surround the reception desk. Recognizing the potential risk, I called the nearby residents to come with me into the kitchen for safety. I also did not feel safe leaving them near the trespassers, as I was unsure of their intentions. While walking to the kitchen, I directed the delivery driver to proceed to the appropriate floor. As seen in the security footage, immediately after I hid, the trespassers left. Before exiting, they appeared to look around the desk as if searching for something. Their intentions are unclear. Security was called”.

142. The trespassers left after being informed that security had been called and was on the way. There was no reported damage or cost, no facilities were closed, and no police involvement occurred. As a result of the trespassing incidents I now require all members of my team to undertake ASB Awareness training and de-escalating training. This comes at a cost of £3,990 plus VAT to Quintain.

Example C3 – Forcing Entry GB01/19 pages 355-356

143. The information set out below derives from an incident report which has been prepared by Shane H after the event based on the incident report and the entry in the Security Logs.

144. On 26/04/2025 at 15:28, four trespassers gained access to the building by tailgating a visitor through Madison West side entrance (not main entrance). They took the lift to the 16th floor rooftop, I presume their intention was to smoke cannabis based on the usual behaviour this group has exhibited in other reported incidents. The Fire Marshal

removed them from the premises. There was no damage reported, no costs incurred, and no facilities were closed. No specific follow-up actions were taken, and the police were not involved. These individuals are frequent trespassers and can be recognised from images captured from CCTV footage and are present in the evidence provided for several of the incidents I have already highlighted. The ringleader of this group and the most regular trespasser that I am aware of looks to be over 18 and has long wavy hair, because of this hair my team have nicknamed him Jesus but during some recent conversations with the police, we have learned that his first name is Adam. The police have also advised that he is heavily involved in drug-related crime locally.

Example C4 – Theft of Vehicle GB01/19 pages 358-364

145. The information set out below derives from an incident report which has been prepared by the Night Concierge after the event based on the incident report and the entry in the Security Logs.

146. On 05/05/2025 at 00:20, three trespassers gained access to the premises, though I cannot confirm the method of entry because it was not captured on CCTV. A resident of Bowery reported that their guest's motorbike was stolen from the Eastern Lands Car Park, which is a private car park for residents and their guests only.

147. The Night Concierge reported the following:

"A distressed man came in to say he had his motorbike stolen from the car park while he was visiting his Dad in Bowery, he saw 3 teenagers dragging it down the road & got into an altercation with them then called the police after, he said he had seen the same 3 teenagers smoking weed near the Bowery section of the car park earlier in the day."

He also asked if he could come back tomorrow to see if there is any CCTV footage of the car park theft & also wanted to warn us of the 3 teenagers in general as he has seen them in the car park before smoking weed quite often”

133. The car park is private and is located underneath (basement level) the Robinson and Madison developments. It is secure and the only entry point for permitted vehicles is via a gated access point, which has an ANPR system, if the car reg is not on the system, it will not allow access. If you are a pedestrian, then you could tailgate or force entry via one of the buildings services i.e. access could be gained from Robinson/Madison or Bowery/Lexington).

134. Whilst I cannot be certain the theft was carried out by a trespasser it is overwhelmingly likely it was given the account of the victim and the fact that I am aware of teenagers regularly trespassing into the car park to smoke weed. The victim described the trespassers and in particular identified the long haired individual known to the team as ‘Jesus’ but I understand from Scott that the police believe his name to be Adam.

135. The trespassers left without our intervention. The extent of the damage and associated costs is unknown. No facilities were closed, no specific follow-up actions were taken, and while it was alleged by the Bowery resident that the police were involved, no CAD number was provided and my team were not contacted to provide CCTV footage so far as I am aware

Buildings E03 – Canada Gardens- highlighted in turquoise blue on the Plan - **GB01/20 pages 365-401**

Example D1 – Accessing the Plant Area **GB01/20 pages 366-374**

136. The information set out below derives from an incident report which has been prepared by Faizanuddin Mohammed enclosed at **GB01/20 page 367** after the event

based on the entry in the Security Logs and the CCTV footage which was saved. I enclose six photos taken from the CCTV footage at **GB01/20 pages 368-374**.

137. On 15/02/2024 at 22:45, based on the CCTV footage I have seen two IC1 males that I believe to be non-residents, based on their odd behaviour, gained access to the building, possibly by tailgating, although I cannot confirm.

138. On the 26th floor, one of them attempted to force open a door by kicking it, breaking the glass, though the door did not open. I saw this on the CCTV footage at the time. They later tailgated residents to continue moving through the building and were caught on CCTV again. Once inside, they moved some furniture storage boxes near the plant enclosure on the roof and climbed on top of the plant room. It's unclear what they did once up there. They left the premises on their own accord. No damage costs were reported. No facilities were closed. As a result, the Fire Marshal and estate team were advised to pay extra attention during patrols. The police were not involved.

Example D2 – Theft of Contractor's Tools from Plant Area on Rooftop **GB01/20 pages 375-387**

139. The information set out below derives from an incident report which has been prepared by Jonahtan Abraha after the event based on the incident report at **GB01/20 pages 376-381**, the entry in the Security Logs and the six photos taken from the CCTV footage at **GB01/20 pages 382-387**. I have seen the CCTV footage and we still hold two videos, one of which can be accessed via the following link **[LINK 07]**.

140. On 20/06/2024 between 14:30 and 17:30, four non-residents gained access to the building by entering through the first-floor stairs, which is a locked side entrance rather than the main entrance with the lobby, and therefore bypassing the security guard on the front desk. Neither I, nor my team recognised the individuals in the CCTV

footage as residents and based on their behaviour it is my firm opinion that they were trespassers.

141. They accessed the rooftop without using the lift and climbed over the plant enclosure into a restricted area. Two of the trespassers entered the Peak side of the rooftop, where one climbed over into the restricted area without a harness and unlocked the door from the inside, allowing the second male to enter and exit with a North Face bag containing the contractor's property. Two more trespassers joined them via the stairs seemingly under the direction of the first two. All four were also caught on CCTV sitting and rolling what looks to me to be drugs and smoking on the terrace. They exited the premises by taking the lift to the first floor of the Thomson Building, avoiding cameras, and then using the side entrance. They left on their own accord and their activity was not discovered until later.

142. The contractor was a window cleaner who abseils down the buildings in order to carry out the cleaning. His bag contained his abseiling equipment namely, a rope, harness and safety equipment worth over £2,000. The trespassers could not have known that his bag containing these tools was left up there without first climbing over the safety barrier to look for themselves. No facilities were closed. As a result, the Fire Marshal and estate team were instructed to be extra vigilant during patrols, and contractors were advised not to store tools in the plant enclosure. The police were informed of the theft under CAD number 01/499499/24, but they did not attend the site.

Example D3 – Hostile and Refusing to Leave **GB01/20 pages 388-409**

143. The information set out below derives from an incident report which has been prepared by Yusuf Khalifa after the event based on the incident report of Shaheryar Saghir enclosed at **GB01/20 pages 389-393**, the entry in the Security Logs and the

CCTV footage I have seen. I have also enclosed sixteen photos taken from the CCTV footage to evidence the activity reported at **GB01/20 pages 394-409**.

144. On 04/11/2024 between 04:55 and 05:25, two male trespassers, who look to me like teenagers in the CCTV images, gained access to the building by knocking on the Lismer main door and being let in by a resident. I watched the CCTV footage and saw clearly that the first trespasser tried to tailgate the resident but did not reach the door in time so it closed and locked. He then knocked on the door until the resident noticed and let him in, presumably believing him to be a fellow resident. The first trespasser held the door open and called for the second trespasser to join him, a few seconds later he did and both trespassers made their way to the club house.

145. At approximately 5:00 the trespassers unlawfully entered the Clubhouse through a window, after spending some time searching for a means of entry. Once inside, I saw them looking around the club house and it looked as though one of them was filming on his phone from the CCTV footage. Mr Saghir found them sleeping on the sofa and upon being confronted they became verbally abusive and threatening when Mr Saghir asked them to leave.

146. The Duty Manager was alerted, and police were contacted at 05:03. Officers responded within 10 minutes, instructing the individuals to leave the premises. It is worth noting that these same individuals had previously trespassed into the Ferrum development that evening, where they verbally assaulted a colleague and caused damage to property. Incident logged under police reference CAD823/04Nov24.

Example D4 – Criminal Damage Broken Glass **GB01/20 pages 410-412**

147. The information set out below derives from an incident report which has been prepared by Yusuf Khalifa enclosed at **GB01/20 pages 411**, the day ASB guard, after

the event based on the entry in the Security Logs and the two photos showing the broken alarm glass and the two trespassers.

148. On 23/03/2025 at around 10:00, multiple residents reported the presence of unauthorised individuals within the development. Two teenage non-residents, based on the images I saw on from the CCTV footage and the picture I enclose at **GB01/20 pages 412**, were seen inside the Thomas Podium entrance though it is unclear how they gained access, possibly by tailgating.

149. The trespassers forcibly activated and severely damaged the emergency door release breakglass, setting off the alarm on the podium level before fleeing the scene. This looks to me like deliberate vandalism.

150. According to the entry in the security log, the Fire Marshal Shane removed them from the Madison West Lobby initially, by querying whether they had a fob and asking them to leave, but they must have entered by alternative means later on because Shane saw them on the CCTV in Madison East at 19:48. The damage required replacement of the emergency breakglass unit, with parts and labour costing £160. No facilities were closed but the emergency alarm was out of action for a few weeks until it was replaced. As a result, the Fire Marshal and estate team were instructed to maintain extra vigilance during patrols. The police were not involved.

Example D5 – Criminal Damage Attempting Access **GB01/20 pages 413-423**

151. The information set out below derives from an incident report which has been prepared by Sonam Rajal, a Resident Associate, after the event based on the incident report enclosed at **GB01/20 pages 414-419**, the police report dated 27.04.2025 enclosed at **GB01/20 pages 420-423**, the entry of Brunel B in the Security Logs.

152. On 26/04/2025 between 15:15 and 15:20, four teenage non-residents attempted to gain access to the building. These are repeat trespassers that I recognise and have mentioned previously. The man with the long curly hair has been identified by the Police as Adam, but my team have nicknamed him 'Jesus'. I saw Adam on the CCTV throwing his body against the door in an effort to force it open. His known associate, from many previous incidents, with shorter curly hair tried to open the door with force in the CCTV footage and the group also tried to use the intercom to be let in by an unsuspecting resident but were unsuccessful. When a resident exited the building, they attempted to tailgate but were confronted by residents from Lismer Apartments 1331 and 632 and walked away.

153. Although they did not manage to gain entry on this occasion, they broke a door panel on the inner side of the door, which dislodged and fell to the ground. The final cost of repairs is still pending, but the estimate is around £300. No facilities were closed. As a result, the Fire Marshal and estate team were instructed to maintain extra vigilance during patrols. The incident was reported to the police under reference number DP-10506-25-0101-00.

Building E05 – The Robinson - highlighted in dark royal blue on the Plan - **GB01/21 pages 424-528.**

Example E1 – Trespasser with offensive weapon **GB01/21 pages 429-433**

The information set out below derives from an incident report which has been prepared by Rodrigues Rodrigues at the time of the event based on his own experience, the entry in the Security Logs and the four photos taken from the CCTV footage enclosed at **GB01/21 pages 430-433.**

154. On 31/05/2023 between 15:30 and 22:30, four individuals, two appearing to be male and two females from the CCTV footage I have seen, accessed the level 18 rooftop. It is unclear from the footage how they gained entry to the development. At the time, they

were noticed on the CCTV footage and during the CCTV review my colleague identified that one of the individuals was seen holding a knife. The knife can be seen clearly in his hand in the second photo I have enclosed.

155. The incident was urgently escalated to me, as the Regional Operations Manager, and I made sure the police were called. The group split up and attempted to flee, but when the police arrived, they detained the individual carrying the knife. All trespassers left the premises. No damage or costs were reported, and no facilities were closed. As a result, there was a renewed emphasis on the importance of preventing unauthorised access to the development and the importance of team members wearing stab vests. The police attended the scene and can be seen handcuffing the individual in two of the attached photos. Although this incident occurred in 2023 there have been trespass incidents much more recently but it has been selected because it demonstrates trespass with a lethal weapon.

Example E2 – Convex Mirror Key **GB01/21 pages 434-438**

156. The information set out below derives from an incident report which has been prepared by the Night Team based on the account from the night team and entered into the Security Logs and from watching the CCTV footage of the car park. The details of the cost of the repairs have been included in the costs tracker at **GB01/pages 585-587** and photos have been taken from the CCTV footage which I have seen.
157. On 18/01/2025 at 20:16, around six teenagers or young individuals were seen on CCTV tailgating into the car park. I have watched the footage and agree they look like teenagers. Once inside, they damaged all the convex mirrors. From watching the CCTV it was deliberate vandalism for the purposes of enjoyment and the pictures I have included show one of the trespassers treating one mirror like a punch bag and then carrying it away with him. They left the premises on their own without intervention as the activity was not known about until after they had left. The damage included three mirrors that were ripped

down and destroyed, with a total replacement cost of £160 as recorded in the cost tracker. While no facilities were officially closed, the absence of mirrors temporarily increased the risk of vehicle collisions in the car park. Quintain were specifically advised by a third-party risk assessor that these mirrors were necessary to mitigate the risk of collisions in the car park. No specific follow-up actions were taken, and the police were not involved.

Example E3 – 1208 Resident Harassment **GB01/21 pages 439-449**

158. The information set out below derives from an incident report which has been prepared by the Concierge after the event based on the entry in the Security Logs, the CCTV footage I have seen and the resident's email.

159. On 29/01/2025 at 16:43, a group of up to ten teenagers or school-aged children gained access to the building by tailgating. Once inside, they went to Apartment 1208 in Robinson West and harassed the resident by kicking her door repeatedly. The group dispersed and I know they ran from the 12th floor on the CCTV footage. The Fire Marshal checked the building and ensured all of them were removed from the site. No damage was reported, no facilities were closed, and no specific follow-up actions were taken. The police were not involved. The Concierge reported the following entry in the security log:

"got 2 trespassers on 17 RW , later had a large group just enter DDA stairwell door and went to 17th floor. Approx. 10 kids now including the one from Madison. His mother has been contacted. Liane called WP security. They are sending someone over to assist once they are removed from the building. Police are going to dispatch a unit .CAD number is 5728. Some ran away into the stairwell to 12th floor. resident reported they were "kicking their door in". later They ran from 12th floor to the stairwell again".

160. This entry shows how team members can be so busy dealing with several incidents that by the time they are able to enter these into the security log they have to enter multiple entries at once.

161. The resident who was harassed explained the team that she confronted the group of trespassers when they attempted to tailgate her and refused them access. It was because of this that they targeted her apartment and harassed her.

Example E4 – Vandalism of Roof Caravans **GB01/21 pages 450-473**

162. The information set out below derives from an incident report which has been prepared by the Concierge after the event based on the entry in the Security Logs, the CCTV footage I have seen and is available to view and can be accessed via the following link **[LINK 08]** and the twenty-three images taken from the CCTV footage showing all of the activity and the costs tracker prepared by my team to detail the costs spent repairing damage.

163. On 01/02/2025 at 16:49, four trespassers gained access to the development by forcing one of the entrance doors open. CCTV footage shows four youths, who look to be school age or young teenagers, making their way to the rooftop where there are three Volkswagen style caravans for use by the residents. These caravans are designed to be a private social space for groups of residents to enjoy. The trespassers can be seen from the CCTV footage forcibly entering, vandalising and climbing on the three caravans and spending a total of around 12 minutes on the roof area before they were evicted by the Fire Marshal. One of them was caught by the CCTV footage kicking the roof of the yellow caravan and intentionally damaging the skylight by removing a piece of plastic and throwing it to the ground. The pictures enclosed with this statement demonstrate the deliberate and destructive behaviour.

164. They also entered both the pink and blue caravans after forcing the doors open using a tool which they brought with them, causing further damage. The Fire Marshal was called to remove them. The damage included £200 for repairing the yellow caravan door, £200 for repairing or replacing the skylight on the yellow caravan, and £100 for furniture damaged inside the pink caravan, as noted in the cost tracker enclosed with this statement. No facilities were closed, and no specific follow-up actions were taken. The police were not involved.

Example E5 – Cycle Store Bike Theft **GB01/21 pages 474-498**

165. The information set out below derives from an incident report which has been prepared by Moin, the Night Concierge, after the event based on the incident report, the entry in the Security Logs and the eighteen photos taken from the CCTV footage enclosed at **GB01/21 pages 481-498**. I have seen the CCTV footage and we have six videos of the incident saved. The footage from one video can be accessed via the following link **[LINK 09]**.

166. On 07/02/2025 at 00:47 and again at 03:26, three individuals known to myself and my staff members as regular trespassers on the Quintain BTR Estate, because they have appeared regularly on CCTV footage but we have no way of knowing their names, gained access to the car park by tailgating. They entered the bike store and can be seen on CCTV inspecting the bicycles closely and using force in what I consider was evidently an attempt to remove one of the bicycles from the rack to steal it. One of the two removed a bike saddle and took it with him. They can be seen using their phones to take photos of the bicycles and making calls. It is my strong opinion that they were planning to return later to steal the bicycles with the assistance of an associate with a car.

167. Later, they returned in a car, clearly with the intention to steal one or more bikes in my opinion. I believe they would have succeeded in stealing one or more bicycles if they hadn't been interrupted by my security team. The night concierge spotted them, and as

he approached, they drove off at speed. Fortunately, no bicycles were stolen, and no facilities were closed. The incident was reported to the police under CAD number 2132/07Feb05.

Example E6 – 17th Floor Social Spaces Vandalised **GB01/21 pages 499-528**

168. The information set out below derives from an incident report which has been prepared by Kenneth Gabriel, a Resident Associate, after the event based on the incident report, the entry in the Security Logs, the fourteen photos taken from the CCTV footage showing the incident and nine photos of the damage caused by the trespassers enclosed at **GB01/21 pages 506-528**.

169. On 08/02/2025 at 17:55, a group of ten individuals gained access to Robinson West by forcing the door through the basement car park stairs. Having watched the CCTV footage (we have saved six videos of the incident) I believe all of the individuals were teenagers. The group made their way to the 17th floor social space, where I was dismayed to see they behaved destructively and caused significant damage to the furniture.

170. At 18:22, when security arrived, the group fled the building. It was later reported by one of my security team that the group attempted to steal a motorbike from a Deliveroo driver but instead they settled for looting the food from the bike before splitting into two groups and running off. This incident was logged in the Security Log separately.

171. They were not evicted from the development because when the Night Concierge confronted them, they ran away of their own accord. The cost of the damage is recorded in the damage tracker enclosed at **GB01/15 pages 425-427** and has totalled approximately £9,440 since 2024. No facilities were closed, and no specific follow-up actions were taken. This incident was reported to the police by Kenneth Gabriel under CAD number 6058/08Feb25.

Buildings SW03A and SW03B – Ferrum (Fe1) and Ferrum (Fe2 and Fe3) - highlighted in dark royal blue on the Plan in orange and red (respectively) - **GB01/22 pages 529-545**

172. I have enclosed photos taken from CCTV footage showing two male trespassers making use of the social areas within Ferrum taken on 11.02.2024 and 04.11.2024 enclosed at **GB01/22 pages 530-535** as this behaviour demonstrates the blatant misuse of the Quintain BTR Estate by trespassers having forced entry.

Example F1 – Smoking Drugs on 15th Floor **GB01/22 pages 536-537**

173. The information set out below derives from an incident report which has been prepared by Daniel Parton after the event based on his recollection, the entry in the Security Logs and the CCTV footage that I viewed at the time but has since been deleted.

174. On 19/02/2025 at 14:32, two trespassers gained access to Ferrum 3 from the adjacent Vantage building. I am not sure exactly how they entered because there was no CCTV coverage of their entry, so far as I am aware.

175. I do know from the CCTV footage viewed at the time, they went to the 15th floor fire escape stairs to smoke drugs and left on their own accord presumably when they had finished smoking their drugs. There was no damage, no cost for remedy, and no facilities were closed. No specific steps were taken afterward, and there was no police involvement. However, the Security Log notes this was the third consecutive night where evidence of trespassers was subsequently found by Mr Parton in the security team during his patrols which suggests to me that these trespassers were repeat offenders.

Example F2 – Smoking on 15th Floor **GB01/22 pages 538-539**

176. The information set out below derives from an incident report which has been prepared by The Night Team after the event based on the entry in the Security Logs.

177. On 20/02/2025 at an unknown time, two trespassers gained access to Ferrum. I don't know how they got in as there was no CCTV coverage. They went to the 15th floor fire escape stairs to smoke drugs and left on their own. There was no damage, no cost for remedy, and no facilities were closed. No specific steps were taken afterward, and there was no police involvement.

Example F3 – Smoking Drugs on 13th Floor and Rubbish **GB01/22 pages 540-541**

178. The information set out below derives from an incident report which has been prepared by the Night Team after the event based on the entry in the Security Logs.

179. On 18/03/2025 at 21:10, two trespassers gained access to Ferrum 3, I presume this was from the adjacent Vantage building but I cannot be sure as it was not caught on CCTV. They went to the 13th floor fire escape stairs to smoke drugs and left rubbish and what looked like remnants of cannabis use accompanied by the smell which lingers behind for a long time because the stairwells are a sealed environment for fire safety reasons. The trespassers left on their own accord as their presence was not discovered until after the event. There was no damage, no cost for remedy, and no facilities were closed. No specific steps were taken afterward, and there was no police involvement.

Example F4 – Persistent Trespasser Smoking **GB01/22 pages 542-543**

180. The information set out below derives from an incident report which has been prepared by the Night Team after the event based on the entry in the Security Logs.

181. On 20/03/2025 at 20:45, one trespasser forced entry by pushing through the mag lock on the main door and was later found by a member of the Night Team in the gym. Before that, he went to the 13th floor fire escape stairs to smoke drugs, I understand from the Night Team this was obvious because of the strong smell of cannabis. The Night security

asked him to leave the gym, but he refused, so police were called by the security guard. The trespasser left before the call connected. There was no damage, no cost for remedy, and no facilities were closed. No specific steps were taken afterward.

Example F5 – Threatening and Intimidating Security **GB01/22 pages 544-545**

182. The information set out below derives from an incident report which has been prepared by the Night Team after the event based on the entry in the Security Logs.

183. On 22/03/2025 at 22:00, two teenage trespassers gained access to Ferrum. I assume they gained access by pushing through a maglock door as this is the usual means of entry for these trespassers, who are known to be repeat offenders. The Night Team believe these individuals are residents of the 'Vantage' building adjacent but I have no way of knowing or proving this. The trespassers went to the 13th floor fire escape stairs to smoke drugs and then entered the gym.

184. When the night security asked them to leave, they threatened to stab the guard if they were asked again. I spoke with the security guard after the event and gave me a full report of what happened. He was clearly shaken and upset by the incident. There was no damage, no cost for remedy, and no facilities were closed. No specific steps were taken afterward, other than ensuring all security guards wear stab vests, and there was no police involvement on this occasion because the security guard has called the police on previous occasions for these trespassers and the police have not taken action.

185. The entry in the security log read as follows:

"Teens from Vantage who always broke doors to enter gym and smoke weed, I stop them entering gym tonight they threatened me to stab if i stop them coming to Ferrum. Contacted police many times on them before

Police Liaison

186. My team maintain regular liaison with the Metropolitan Police, who are well aware of the ongoing issues we have been experienced and with whom we have logged serious incidents for record-keeping and further investigation. However, the police are unable to provide us with the assistance we need due to a lack of resources and will only intervene if there is criminal activity and can only potentially address the position after the damage or harm has occurred. This does nothing to prevent the overall issue.
187. Incidents where the police have attended following trespasser activity included a fire, reports of drug dealing, a trespasser carrying a knife, a contractor finding a knife and some incidents of criminal damage.
188. Although the police have declined to formalise their support for this application by providing a supporting statement, I understand from what my colleague Scott McCormick, who is the head of Wembley Park Estate security, tells me that PC Waren Nash explained to him that the police are supportive of the injunction, recognising it as a practical tool to assist with enforcement going forward.
189. My team and I also work closely with the Wembley Park Estate's dedicated security team, which provides 24/7 coverage. Despite this, the size and open nature of the Wembley Park Estate presents significant logistical challenges. The effectiveness of additional security staff is limited. The nature of the site is such that it cannot be fenced off and enclosed to prevent access and it is simply not practical for Quintain Limited to police the entirety of the Quintain BTR Estate simultaneously and the trespassers seem to seek out and target the buildings with the least security presence at any given time. Access is required for the residents and occupiers of the Quintain BTR Estate and their various lawful guests and visitors.

190. On 15 April 2025, a joint meeting was held with Police, security and resident representatives to discuss further measures. My colleague Scott attended and he informed me that all parties present acknowledged the limitations of private security efforts and PC Warren Nash expressed support for this application for an injunction.

191. While we continue to do everything possible, security responses are limited by cost, practical limitations and the need to preserve residents' freedom and quality of life.

Land over which Injunctive Relief is sought

192. The land in respect of which a precautionary injunction is sought is shown on the Plan exhibited by Sarah at **SB/01 page 2** and covers all the private residential blocks within the Quintain BTR Estate. This includes:

- a. Landsby – this building was completed in 2018. Since 2023 there have been 323 of incidents of unlawful encroachment which have been logged and I assume many others which have not been logged.
- b. Ferrum - this building was completed in 2019. Since 2023 there have 36 incidents of unlawful encroachment which have been logged and I assume others which have not been logged. I note at this point that Ferrum experiences a comparatively low number of trespasser incidents when compared with the other developments that are fully operational and occupied and listed below, I believe this is because of its location towards the Southern most edge of the Quintain BTR Estate, the other side of the stadium and the fact it is not surrounded by other Quintain developments. It is my view that the trespassers like the fact that they can attempt to trespass into one of the developments to the North of the Quintain BTR Estate; such as Landsby or Repton Gardens and if they are unable to gain access, because additional security guards are present, they can try one of the other developments

nearby. Madison, Canada Gardens and The Robinson are all located close to one another and to Landsby and Repton Gardens so also provide excellent grounds for the trespassers to engage in their games of cat and mouse or whack-a-mole with the security guards. The same principle is true for those trespassers who are opportunistic and seeking to enjoy either the residents' facilities within the luxurious Quintain BTR Estate or those who are criminally-minded and are looking to steal something of value or somewhere secluded to take drugs.

- c. Canada Gardens – this building was completed in 2020. Since 2023 there have been 280 of incidents of unlawful encroachment which have been logged and I assume many others which have not been logged.
- d. Madison – this building was completed in 2021. Since 2023 there have been 56 incidents of unlawful encroachment which have been logged and I assume many others which have not been logged.
- e. Robinson – this building was completed in 2021. Since 2023 there have been 537 incidents of unlawful encroachment which have been logged and I assume many others which have not been logged.
- f. Repton - this building was completed in 2022. Since 2023 there have been 166 incidents of unlawful encroachment which have been logged and I assume many others which have not been logged.
- g. Luna building. This building was also completed in 2024. It has only recently been let, so there are very few residents living there at this stage. The first incident of trespass has just occurred in June, but given that it is advertised online, I expect it will not be long before we experience frequent trespass incidents at this building too as part of the same pattern of behaviour and that

is why this development, and Solar, have been included in this application. I consider this a real, present risk.

- h. Solar building. This building is still currently under the principle contractor possession and still a construction site, pending approval for occupation shortly. It is currently unoccupied. There have not yet been any incidents of trespass. In my experience of the trespass activities, it is my firm expectation that trespassers will begin to target these two new developments as soon as they become aware of them. However, as with Luna above, I firmly believe it is simply a matter of time before this building is targeted.

193. The trespass and nuisance and other unlawful conduct I have described has occurred and continues to occur across the Quintain BTR Estate and whilst some of the buildings have experienced more incursions than others, the whole of the Quintain BTR Estate is vulnerable to trespass and the risk is not limited to any particular building.

194. I believe that, absent injunctive relief, further acts of trespass will continue to take place at all of the buildings within the Estate – there is nothing to suggest that it will stop and as long as the trespassers continue to successfully in breaking in with impunity, there is a real risk that it will get worse.

195. That belief is based on:

- a. the long history of trespass and nuisance which has been experienced to date and which is ongoing and increasing despite best efforts to try and prevent or deter it;

- b. The nature of the trespass as set out above, which involves motivated groups of young people evading the security systems and apparently determined to enter the various buildings for 'sport';
- c. the fact that the effectiveness of additional security staff and measures are limited as set out above and that the security measures and potential for police intervention are clearly no effective deterrent;
- d. the fact that the trespassers have an established modes of entering the properties which have been shown to be vulnerable to trespass by tailgating and by forced entry.
- i. the fact that the trespassers have been seen to be prepared to go to great lengths in the course of their unlawful activities, including repeatedly breaking locks, causing criminal damage and engaging in anti-social behaviour, without regard for anyone else's safety or comfort.

196. While the level of activity fluctuates between developments, overall it is increasing. There is nothing to suggest that it will cease without legal intervention. The injunctive relief sought is designed to prevent further unlawful entry and anti-social behaviour, protect residents and staff's safety and well-being and preserve the integrity and security of the premises. I consider that the injunction is necessary to protect the whole of the Quintain BTR Estate and the occupiers from ongoing intrusion and it is hoped that an injunction would be a sufficient deterrent to dissuade persons who have trespassed before or might otherwise be inclined to trespass in the future from participating in, or repeating, such activities and to protect the premises and residents from further harm.

Urgency

Although the trespass detailed in the evidence before the Court has been experienced for a long time, it has had, and continues to have, a severe impact on the Claimants business, its reputation, its residents, its staff. Efforts have been made to manage the problem but it has become increasingly clear that we have reached a point where it is clear that the problem is unmanageable and that the Court's intervention is required.

197. The Claimants seek an injunction against "persons unknown" at present being those unidentified persons who may enter or remain on the property in the future without the consent of the Claimants or persons authorised by the Claimants. At present, the identity of the persons engaging in this conduct is unknown for the reasons explained above.

Identification of the Defendants

198. Most of the persons who regularly trespass to date have not been arrested or identified by the police, as far as I am aware. There has been was one occasion on 8 February 2025 when the police intervened and took the details for a number of trespassers following the incident of criminal damage in the Robinson referred to above at paragraphs 170-173, but the names were not shared with myself or Quintain despite our requests, but because the trespassers were underage the police would not share the details. Although individuals vary between incidents, I have from time to time recognised the faces of certain 'repeat trespassers' but have never been given their names. Interestingly, I noticed that those trespassers who were arrested in the Robinson criminal damage incident have not appeared to return to the Quintain BTR Estate as far as I am aware which suggests that consequences with the police are the only useful deterrent.

199. As mentioned above, it also appears that some of the trespassers are relatively young and are likely under the age of 18. From the CCTV footage that I have viewed, pictures I have seen and on the occasions I have seen the trespassers myself, I have formed the

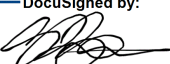
view that many of these persons operate in gangs or groups and engage in the activity of trespassing into the Quintain BTR Estate as a kind of 'sport'.

200. Given the likely young age of the protestors and the fact that asking for their names has tended to inflame the situation as set out above, my team have been cautious when seeking to identify them and the Claimants would not want to inappropriately or mistakenly name someone as a defendant to injunction proceedings, and will only name a defendant of whose identity they are sure.

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:

DocuSigned by:

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Gareth Bone

Dated: 1 July 2025