

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

Claim No: KB-2025 -002314

Second Statement

11 July 2025

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

Defendants

SECOND WITNESS STATEMENT OF GARETH BONE

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

1. This is my second statement in support of the Claimants' applications for relief against the Defendants. In this statement I confirm certain matters around initial notice of these proceedings, and provide a brief update on trespass incidents that have occurred over the very recent days.

2. I attach a bundle of true copy documents to which I shall refer marked as exhibit “GB02”. Numbers in square brackets refer to the page number of exhibit GB02. I adopt definitions from my previous statement.

Notice of the claim and hearing

3. I understand from the Claimants’ solicitors that the claim form, brief details of claim, application notice, certificate of urgency and draft order were filed with the court in the course of the afternoon of 1 July 2025.
4. That evening, copies of all these documents were posted on Quintain’s website at this address: [Trespass Injunction – Quintain Ltd](#). A screen shot of that page as it currently stands is at **[2-3]**.
5. Also during the course of the afternoon of 1 July 2025, notices informing third parties of the fact that the Claimants were pursuing these proceedings were placed around the buildings affected by this claim on the areas marked with a coloured shield on the plan at **[4]**. A copy of the notice is at **[5]** and a document prepared by my team to demonstrate that notices have been affixed on the developments is attached at **[6-24]**.
6. In the course of 2nd July 2025 the sealed claim form and application notice were added to the website, along with my signed statement and exhibit and the statement of Sarah Birchley with its exhibit. The exhibits to my statement were added to the website on 3rd July 2025.
7. In the afternoon of 8th July 2025 the notice at **[25]** informing of the anticipated hearing date was attached the main front door of each of the developments and also uploaded to the website.

Recent incidents of trespass

8. By way of evidence that the acts of trespass continue, I set out in brief the incidents that have been recorded since I finalised my last witness statement as reported to me by my security team below:

Date	Time	Building	Incident
30/06/2025	16:45	Robinson	X3 youth entered the building, via the Robinson West DDA access corridor, tailgated into the lift lobby and made their way to rooftop, floor 18th floor. Then made their way to floor 17 resident lounge, where shortly removed by security guard at 16:58
01/07/2025	11:18	Canada Gardens	x1 youth, male, found to be in resident lounge on podium, was identified by Resident Team member Sonam on Patrol, Security Guard engaged and removed at 11:36, full patrol of Podium conducted.
01/07/2025	18:55	Repton Gardens	X2 individuals loitering in a car, in the port-cochere in Repton Gardens, blocking access to part of the building, team were made aware by a resident. Team engaged and received resistance and in the words of the team onsite 'attitude', Security Guard arrived and they had moved on at 19:04
02/07/2025	15:51	Robinson	X2 Youths, male, made their way to Floor 17 of Robinson West and accessed the resident Lounge, The trespassers reported by team onsite to the Security Guard, whom promptly removed them.
03/07/2025	15:50	Landsby	X1 youth, trespassed into the Landsby gym and started to use the equipment, this individual is known to the team onsite for repeat trespassing and at times ASB, security was notified and removed
03/07/2025	17:07	Canada Gardens	X3 Trespassers located on patrol, security advised and trespassers shortly removed at 17:17.
03/07/2025	17:32	Landsby	X1 trespassers accessed Landsby gym, was promptly removed by guard. They accessed by pulling open the door, door was reported to not be functional correctly after incident, was logged with maintenance and was attended and repaired same day.
03/07/2025	18:38	Ferrum	X3 trespassers identified on podium in dog run smoking with in development, security made aware and attended, they leave at around 18:43, guard conducted a patrol on development. Confirmed all clear at 19:32
03/07/2025	19:49	Landsby	Trespassers on Podium in Landsby, youths throwing items, causing a nuisance.
05/07/2025	16:09	Robinson	Trespasser located with in Car park, then made way to DDA stairwell and loitered, security arrived conducted a patrol, found the individuals and removed around 16:34
05/07/2025	18:38	Canada Gardens	Resident made the team aware that there are trespassers with in the Work From Home sheds (amenity space) on podium, security attended and removed at 18:45
06/07/2025	13:29	Canada Gardens	Attempted tailgating by trespassers into development via coach park access point, member of team actively stopped.
06/07/2025	16:49	Ferrum	Trespassers made their way into the gym, security was notified and there where shortly removed at 17:11
06/07/2025	17:46	Landsby	X3 Trespasser identified by team onsite with in Landsby East, they where loitering and smoking weed, security notified and removed at 17:54
07/07/2025	16:44	Robinson	Trespassers located entering in to a stairwell, security attended, patrol conducted by trespassers after a patrol was conducted could not be found.
08/07/2025	09:38	Robinson	X1 trespasser located on roof of Robinson South, smoking with in the amenity space.
08/07/2025	11:32	Landsby	X2 trespassers identified on CCTV in Landsby Gym, security arrived and removed at 11:45.
08/07/2025	13:24	Canada Gardens	X1 trespassers in Canada Gardens gym, security attended and removed. (This is the same individual who prior trespassed into Landsby gym)
08/07/2025	16:08	Canada Gardens	X7 trespassers located on patrol, removed by security guard.
08/07/2025	17:04	Robinson	x10 youth trespassers identified with in Robinson west, made their way to Robinson rooftop, into stair core to smoke weed, police were called, no CAD provided (we where updated they would attend, no ETA provided, at the point this note was added, no attendance was received [10/07/2025- 9.00] security attended and removed from development.
09/07/2025	15:05	Canada Gardens	Resident reported a trespasses on floor 9, security attended, no one located but evidence of smoking weed/ trespassing.
09/07/2025	17:47	Landsby	Trespasser removed from Landsby Gym.

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:

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Gareth Bone

Dated: 11 July 2025