

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

Claim No: KB-2025-002314

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

THIRD 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.

2. I made a witness statement dated 1 July 2025 (“Statement GB01”) in support of the successful application for an injunction, which was granted by her honour judge Catherine Howells by the sealed order dated 15 July 2025 (the “Injunction”) which I exhibit at **GB03/01 and pages 2-20**, further I exhibit copies of the judgment of her honour judge Howells at **GB03/02 and pages 21-32** and a copy of the transcript from the hearing on 14 July 2025 at **GB03/03 and pages 33-61**. I adopt the definitions from that statement in this statement save where directed otherwise.

Overview

3. I make this witness statement in support of the application for summary judgment in the application for the 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, to be renewed for a period of 5 years with annual reviews.
4. 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.
5. Since the Injunction was granted the number of trespass incidents within the Quintain BTR Estate has not ceased entirely, but has dropped significantly. I exhibit two graphs that were prepared by my team showing the number of trespass incidents per calendar month (the “Incident Graphs”) over a number of months **GB03/04 and pages 62-63**. These numbers have been taken from the Security Logs that were exhibited with my previous GB01 statement and from the monthly security logs for July 2025 – 17 November 2025 (inclusive) which I exhibit with this statement at **GB03/05 and pages 64-75**.
6. The Incident Graphs clearly show that the number of trespass incidents dropped sharply in August 2025, being the first full month following the Injunction Order. I believe the current trending analysis clearly shows the impact the Injunction has had, while we do

still see incidents, repeat offences are far less regular, overall incidents have become less significant and impactful (as a whole) on the resident experience.

7. My evidence around the underlying cause of the trespasses in my previous statement remains, in my view, accurate. It is my firm belief that it is only the presence of the Injunction that has caused the drop in trespass incidents and I am confident that were the injunction to be removed, incidents of trespass would increase dramatically shortly after.

Report on aftermath of Injunction

8. In accordance with the notice requirements in paragraphs 7-10 of the Injunction, I ensured that the following steps were taken to ensure Persons Unknown were notified of the Injunction:
 - A copy of the Injunction was uploaded to the Quintain website on 18 July 2025;
 - Copies of the Injunction, the Warning Notice and an explanation of where the application can be accessed electronically and in hard copy were affixed to all of the locations included in the Notification Plan enclosed at Schedule 2 of the Injunction and I exhibit a copy of the Warning Notice that is affixed at **GB03/06 and pages 76-77**;
9. Immediately after the grant of the Injunction I sent an email to the whole Security Team on 18 July 2025 explaining that the Injunction had been obtained, what it meant and detailing the process for dealing with trespass incidents going forward. I include a copy of this email in the chain of emails exhibited at **GB03/07 and pages 78-83**.
10. I also informed the Police of the Injunction on or around 18 July and asked for Police assistance with enforcing the Injunction. I sent a further email to the Security Team on 29 July 2025 (also exhibited within the chain of emails at **GB03/07 and pages 78-83**),

briefing them on the process I agreed with the Police. Being, in the event of a trespass incident, the Security Team are briefed to:

- Call the Fire Marshal to attend any incidents of trespass;
- Notify the Security Team using the Whatsapp Group and the site radios at each desk;
- If the trespassers are not considered by the team to be regular trespassers, then the Fire Marshal should remove them from the site, explain that an injunction against trespass is in place and show them the warning notices as they are escorted off the premises.
- Hand out physical copies of the Injunction and warning notices to trespassers and advise the individuals of the QR code so they can obtain digital copies; and
- Explain to the trespassers that whilst this is a warning, if they return again they will be reported to the Police and they may be arrested for contempt.

11. If the trespassers are identified as repeat trespassers, the Security Team and Residents' Team were briefed to:

- Contact the Police and provide the Intel reference number, this is done by the Residents' Team so that the Security Team are available to engage in the situation (if necessary);
- Advise the Police that they are repeat trespassers and request attendance to lawfully obtain their identification and contact details;
- Provided the Police agree to attend swiftly, the Security Team are to await Police attendance. However, if there is a delay or any perceived threat to staff or residents the trespassers should be removed without delay;
- Assuming the Police do attend and obtain the identification and contact details of the trespassers, these details must be requested from the Police by submitting a Request for Information and Response (310) in the form exhibited at **GB03/08 and pages 84-88**; and
- A decision will then be made as to whether to serve the individuals with a further warning notice at their home address.

12. If the Police cannot attend within a short period of time, the Security Team are briefed as follows:

- The Fire Marshal should proceed to remove the individuals (ensuring the body camera is on);
- All footage must be downloaded from the body camera and the CCTV;
- All incidents must be logged and reported via the incident reporting system; and
- Stills must be captured from the footage and sent to the Police by email to request individuals' details retrospectively if they are known to the Police. Again, this information was not made available to us by the Police before the Injunction.

13. In order to determine whether a trespasser is a repeat offender, the Security Team and Residents' Team use the CCTV and body camera footage to share pictures of trespassers

on the Whatsapp Group and inform one another if an individual has been seen before using the Whatsapp Group and the on-site radios.

14. To support the delivery of the Injunction, I arranged meetings with the senior management team of our security partner, PACE, who were fully briefed on the Injunction and the additional steps in our process, referred to at paragraphs 10 and 11 above.
15. With PACE's co-operation, all external security guards were briefed on the updated procedures and are continually provided with all key updates regarding the Injunction and how to respond to incidents of trespass.
16. I also issue regular emails to the wider operations team at Quintain and other support partners to facilitate effective implementation of the Injunction and, where required, to ensure appropriate action is taken if/when known individuals are identified as breaching it.
17. Additionally, the Injunction remains a standing agenda item in senior leadership meetings to ensure continued focus and to assess its efficacy.
18. Furthermore, Quintain has continued to collaborate with the local Police, to support resourcing of our lawful request to obtain the trespassing individuals in breach of the Injunction. We have maintained regular communication, taking on feedback and advice to further assist us with the decrease and ultimately eradicate of all trespassing and anti-social behaviour within Quintain BTR Estate. I have exhibited an email summary of the liaisons with the Police sent by Scott McCormick, who is the head of security for the Wembley Park Estate at **GB03/09 and page 89** and an email chain between Scott, myself and the Police dealing with the process of obtaining identity and contact details of repeat trespassers at **GB03/10 and pages 90-95**.

Description of the benefits of the Injunction

19. We are now only experiencing 20-30 trespass incidents per month down from over 120 at its peak. I would describe the issue now as "manageable" whereas previously it was beyond the ability of the on-site teams to manage in isolation. Whilst we endeavour to bring the number of incidents down further, the current level is a drastic improvement.
20. While incidents of trespassing do still occur, the situation has shifted from being a daily challenge to a less frequent issue. This improvement has allowed the team to focus more effectively on individual incidents and take the necessary action against those few individuals who ignore the warning notices.
21. I have noticed the following tangible benefits of the reduced number of trespass incidents:

- a) No reduced or restricted access for residents - areas such as the Canada Gardens rooftop, which had previously been out of action due to door damage by trespassers, as well as other spaces that experienced similar issues, are no longer having to be closed as we have seen a reduction in such incidents of damage by trespassers. As a result, myself and my team have not faced the same level of disruption as before, when resident amenities were unavailable due to damage caused by trespassers.
- b) Resident feedback - Overall, general feedback has been very positive both verbally to the Residents Team and from the recent Trustpilot reviews, as I refer to at paragraph 23 below. Residents have responded well to the fact that we have taken proactive steps to obtain an injunction. While some residents (very few) still view anti-social behaviour and trespassing as ongoing concerns, they have verbally expressed reassurance that we have a clear plan in place and are actively addressing the issue. Several residents have also commented positively on the improvements and noticeable impact since the Injunction was obtained.
- c) Reduction of costs spent on damage - Costs from trespasser damage are demonstratively lower than they were last year, and I exhibit a cost comparison provided by Quintain's Facilities and Maintenance team at **GB03/11 and page 96** which shows the costs incurred during October 2024 were £9,054.72, whereas the costs incurred during October 2025 were £7,084.08, a reduction of over 20%, but it is worth noting that there is likely to be a lag effect for costs because some repairs to mechanical items such as doors and CCTV are still required due to historic damage caused by trespassers. I expect that over time this comparison will be more stark and costs will continue to drop.
- d) Reduction of costs spent on additional security – As I mentioned in my previous statement, I hired additional security guards during what I called 'hot spots', being periods of intensified trespasser incidents and during school holidays or events. Conversely, I have not hired any additional security resources since the Injunction. In financial terms, for the period September to November 2024, Quintain spent £13,397 on additional security to support the Security Team and to cover vulnerable doors. This year we have spent £0 to-date for the period September to November 2025. I believe this is a direct result of the Injunction.

22. Originally, the primary focus for our Residents' Team was resident engagement and improving overall residents' experience, but this was side-lined because they spent much of their time dealing with incidents of trespass or the consequences of such incidents. Now that the trespass situation is more manageable, the teams have the capacity and time to both address the trespass incidents proactively and follow up thoroughly but also to add value to the residents' experience in other ways. This can be small interactions, such as having time to discuss any concerns or comments if the residents come to the reception desks or to visit residents' apartments to help them use

appliance. Importantly, the Residents' Team also has more time to dedicate to ensuring new residents have a smooth moving in process, providing them with lots of assistance and advice but also arranging follow up check ins to see how they are settling in.

23. Residents are again benefitting from a dedicated team with time spent enhancing their overall experience, something that has noticeably improved since the Injunction. We can see meaningful improvement across the Quintain BTR Estate and this is reflected on review platforms such as Trustpilot and Google. In July, prior to the Injunction, our Trustpilot score was at 3.8 stars with 799 reviews. As noted in my first witness statement, one of the primary concerns raised in the reviews was trespassing and anti-social behaviour within the Quintain BTR Estate. Since the Injunction, our Trustpilot score has risen to 4.3 stars with 906 reviews and I exhibit a picture of our Trustpilot score and a Trustpilot trending graph from November 2024 to November 2025 at **GB03/12 and pages 97-98** to show this increase.
24. In the period from the Injunction up until the week commencing 24th November, we have seen an additional 104 reviews and this significant rise from 3.8 to 4.3. I do not believe this would have been possible without the decrease in trespass incidents and the improvements in resident experience driven directly and indirectly by the Injunction. I have also exhibited a Trustpilot keywords list at **GB03/13 and page 99** showing that no reviews since the Injunction have mentioned '*trespasser*' or '*trespass*' or '*crime*'.
25. The Residents' Team now have more capacity to arrange resident events as less time is spent reviewing CCTV and recording incidents. The most recent was a Halloween celebration, which featured a masquerade ball for adults and a separate event for children. These initiatives bring the community together by providing a platform for residents to meet their neighbours, enjoy shared experiences and build a genuine community atmosphere. The Residents' Team can now spend more time organising other events of this nature.
26. I have also noticed, through my interactions with them, that the Quintain staff seem much happier now that they are able to focus on positive improvements instead of spending so much time focusing on the negative trespasser issues. There have been four exit interviews carried out since the Injunction and none of those employees mentioned the trespass incidents as a reason for leaving, this is a stark contrast with the exit interviews I referred to at paragraph 83 of my first GB01 statement.
27. I am aware of a significant decrease in overall outstanding maintenance cases now that there are less incidents of criminal damage by trespassers. Consequently, the maintenance team are able to spend more time resolving in-apartment issues, as there are fewer communal cases, less communal triage, reduced planned preventative maintenance on frequent trespasser entry points and site inspections due to the substantial decline in trespassing incidents. The list of outstanding maintenance issues

has dropped from c.700 to c.70, which significantly increases resident satisfaction because their maintenance issues are dealt with quickly. I consider this an indirect benefit of the Injunction.

Changes in trespasser behaviour post-Injunction

28. Since the Injunction, I have observed a change in the profile of trespassers. These are now mainly first-time offenders who primarily need to be informed and educated about the existing Injunction, and generally these individuals do not seem to return. This is a notable change from pre-Injunction incidents, where the majority of incidents involved repeat offenders. In my previous statement I referred to the ‘*whack-a-mole*’ nature of these incidents and the difficult faced by security staff as a result, but this phenomenon has been effectively eradicated since the Injunction was put in place.
29. Secondly, I have seen a notable reduction in incidents of criminal damage both related to gaining access, where trespassers used to regularly force open doors using their bodies or tools, and acts of mindless destruction such as the examples in my first statement such as ripping out and throwing lights in communal areas, jumping on top of caravans, kicking doors and smashing mirrors in the car park. Almost all of the post-Injunction trespassers have gained access by tailgating or using the intercom to gain entry from a resident. There has only been one recorded incident of criminal damage since the Injunction was obtained which is a significant achievement.
30. I have also noticed that the demographic of trespassers continues to be predominantly young people, who appear to be aged between 12 and 20 from the CCTV footage I have seen, but it is now quite rare for a trespasser to appear to be an adult. This suggests to me that adults are deterred by the Injunction. Most importantly, the frequency of more aggressive or confrontational individuals trespassing on the Quintain BTR Estate has decreased significantly and is now very occasional fortunately.

The ongoing risk of trespass

31. Based on the persistent and escalating nature of the incidents prior to the Injunction and the notable reduction since the Injunction was granted, I am confident that if the Injunction were removed, the number of incidents of trespass would swiftly return to unmanageable levels and all of the issues experienced previously would return putting Quintain back in the same position as before the Injunction.
32. As described in my previous evidence, the root cause of the trespass action is ultimately down to the draw of the attractive environments created by Quintain throughout the BTR Estate to local young people. Nothing has changed about this root cause.

33. One of the most positive outcomes of the Injunction has been the Police's willingness to engage with myself and other members of Quintain staff, as mentioned above, as a result of the Injunction and warning processes we have been able to put in place since it was granted, as set out below. Whereas before the Injunction was in place the Police were unwilling or unable to assist, now we provide the Police with monthly updates as to any trespasser activity.
34. Immediately following the Injunction we saw a significant decrease in trespasser incidents and, in accordance with the procedure at paragraph 10 and 11, the Security Team will only involve the Police where there is a repeat trespasser. Consequently, it was not until 31 October 2025 that the Police were called to attend the Quintain BTR Estate due to a trespasser incident following the Injunction.
35. The trespass numbers are still low, which is clear from the rolling two-month average shown by the dotted lines on the Incident Graphs and we have not experienced the same surge in numbers that we did in Autumn last year. However, in the last few weeks this has started to tick up slightly, and I have included details of two recent incidents involving some repeat trespassers below at paragraphs 42 and 44 by way of example.

Service of Warning Notices

36. As I expected, for a small number of persistent offenders, the warnings given by the notices and security are not enough to deter the most determined trespassers and we have resorted to calling the Police to obtain the trespassers' contact details in order to deter ongoing breaches. This is necessary because the Security Team have no power to detain trespassers or to require them to provide their identification or contact details.
37. Three incidents have recently occurred, on 31 October, 7 November and 11 November, where the Police were called and some of the trespassers were required to provide their information. Whilst it is too early to tell whether these individuals will return to the Quintain BTR, so far they have not returned since the Police took their details.
38. As mentioned at paragraph 11 above, I have agreed a mechanism with the Police, who have now provided Quintain with the names and addresses for individuals trespassing on two separate occasions, with a third request being processed in accordance with the mechanism I refer to in paragraph 12 above. The key advantages of obtaining these details are so that we can serve a warning notice on the individuals at their home address, which in the case of teenagers is designed to make their caregivers aware of the behaviour. Secondly, if the individuals return to the Quintain BTR Estate for the purposes of carrying out anti-social behaviour and/or criminal damage and Quintain

decides it is necessary to bring contempt proceedings against them, we will be able to identify the individuals.

39. This is still a new process and has only been possible as a result of the Injunction, because the Police will now engage with and assist Quintain. This engagement has been transformative in terms of enforcing the Injunction and ensuring it is an effective deterrent for trespassers.

Recent Incident Examples

40. I set out below two recent examples of trespass post Injunction and how my team responded.
41. On the 31st of October 2025 the following incident, with Police reference number CAD 7528/31OCT2025, was recorded by Faysal Qassem, a Resident Manager, in the incident report dated 3 November 2025 exhibited at **GB03/14 and pages 100-104**. I have exhibited a still image taken from the Police's body camera footage showing the line of 8 trespassers along a corridor before the Police began their stop and search and taking the identification and contact details of the trespassers at **GB03/15 and page 105**.
42. 19:45 - A resident of Ferrum, Apt 1143 enters the building and is followed in, or tailgated, by 6 trespassers. I have exhibited 5 still images taken from the CCTV at **GB03/16 and pages 106-110**.
- a. 19:53 - A resident of Ferrum (40 South Way), Apt 1442 enters the building through the White Horse Square entrance (secondary entrance, which is not staffed) and was tailgated by 1 trespasser.
 - b. 19:57 - The trespasser returns to open the door to allow access for 1 additional trespasser, at this point there was a total of 8 trespassers.
 - c. One group of 6 trespassers take the elevator to the rooftop whilst the other 2 make their way to the stair core.
 - d. During this time, a resident informed the front desk that some potential trespassers were spotted entering the building. Moments later, Nuno from PACE security entered the building to begin his shift and was informed of trespassers and called the Police immediately.

- e. 20:08 The Police arrive and are on site until 22:07 where they are seen to be talking to and taking details of all trespassers who they collected from the rooftop and removed from the Quintain BTR Estate.
43. Following the incident, the Police provided Quintain with the trespassers' details and I exhibit copies of the 7 warning notices dated 12 November 2025 at **GB03/17 and pages 111-134** and the email from the process servers at **GB03/18 and pages 135-136** explaining that these notices were served at the home addresses of these repeat trespassers where possible. These notices set out the behaviour that was observed in detail and give a final warning, explicitly stating *"If you breach the injunction again, we will be entitled to apply to court to begin contempt of court proceedings against you. If you were found to be in contempt of court you could be sent to prison or fined"*
44. On 7th November 2025 the following incident, with Police reference number CAD 7071/7NOV2025, was recorded by Anne-Julie Da Gama, Resident Associate, in the incident report exhibited at **GB03/19 and pages 137-141**.
- a. 18:40 - Trespassers were seen tailgating a resident and entering the Ferrum (40 South Way) by the front desk team while reviewing CCTV. A group of 5 individuals (1 boy, 4 girls), then another 3 entered (1 boy, 2 girls). All 8 trespassers entered the lift to go to the roof top. I exhibit a still image taken from the CCTV at **GB03/20 and page 142**.
 - b. 18:41 – the Guard is notified, who begins to make their way to Ferrum rooftop, believed to be the location they are making their way too.
 - c. 18:42 - Police were called by Anne-Julie Da Gama, Resident Associate. I was advised they would be arriving in 1 hour despite mentioning that we have an injunction and they are repeat trespassers.
 - d. 18:55 - Fire Marshal arrived to go to the trespassers. As he escorted 2 in the lift downstairs, some hid and went down the stairs.
 - e. 19:05 - Police arrived earlier on scene and found the remaining trespassers. They took down details of the trespassers to provide to Quintain. I have exhibited a still image taken from the Police's body camera footage showing the Police taking the identification and contact details of the trespassers at **GB03/21 and page 143**.
 - f. 19:42 - Police left the scene (with 1 of the females) and said to reference the CAD number if any of the individuals are seen on site again.
45. In both of the above incidents, the team followed the injunction process for repeat trespassers, alerting the guard to the incident to support removal from the building but also at same time advising the Police of the required support, using the intel reference number.

46. In both of these incidents, I followed up with the Police to obtain the individuals' details by completing a 310 Form (under Schedule 2, Part 1, paragraph 5(3)(a), Data Protection Act 2018), request for information via the Brent ASB unit. I exhibit the Form 310 for the incident on 7 November at **GB03/22 and pages 144-149** and the same for the incident on 31 October 2025 is exhibited at **GB03/08 and pages 84-88** (as I mentioned at paragraph 11).

Ongoing threat level


47. My aspiration remains to fully eradicate trespassing and anti-social behaviour within the Quintain BTR Estate. The Injunction has been and continues to be invaluable because the reduced frequency of incidents now allows us to manage the remaining incidents more effectively. The threat of contempt proceedings seems to me to be an effective deterrent, and we have the resources to execute an organised response and be proactive now that we are not 'spread too thinly' dealing with constant trespass incidents across the Quintain BTR Estate. I believe our organised response process (as detailed at paragraph 11) will lead to the numbers of incidents being reduced even further over time as the individuals tell their friends and the word gets around that the Police will take action against trespassers at the Quintain BTR Estate.

48. Aside from the Injunction, and the response steps taken by the security team to notify trespassers of the Injunction and warn them of the consequences of repeat breaches, I do not think there has been any other contributory factor to the falling number of trespass incidents which causes me to believe that the frequency and severity of the trespass incidents would return if the final injunction is not awarded.

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: 27 November 2025