

Page	Ref.	Relevant Details of Lease
09	2(xii)	[The right of the lessee or persons deriving title under this lease] to enter onto the pedestrian ways within the Landlord's adjoining land to which members of the public have access for the purposes of stewarding policing, directing and controlling <i>access and egress from the premises.</i>
14	2(xv)	[The right of the Landlord or persons deriving title under this lease] full right and liberty for the landlord and those authorised on its behalf to enter on to the pedestrian ways within the <i>Premises</i> to which members of the public have access for the purposes of stewarding policing, directing and controlling <i>access and egress from the station.</i>
04	1(xix)	"The Premises" includes the land, the raft, the airspace, the ventilation system, the columns and Foundations.
04	1(xx)	"The Raft" means the raft shown hatched in blue on plan A and in section verged blue on Sections A B C D and E.....
03	1(x)	"The Land" means the two areas of land shown edged blue on Plan A and fronting Great Ducie Street, Trinity Way, Cheetham Hill Road and Hunt's Bank.
36	(LL)(i)	To afford all facilities to the Landlord to enable the Landlord to exercise fully the right reserved in clause 2(xv), and to enable the British Transport Police to exercise their policing functions so far as they are by statute authorised to do within the premises and to comply with their lawful directions including, but not limited to, the closure of the passageways for such periods as might be directed.
37	(LL)(ii)	To reimburse the Landlord for all proper and reasonable costs and Expenses incurred pursuant to the exercise of the right reserved in Clause 2(xv) that would not have been incurred but for this Lease including, but not limited to, the provision of any additional accommodation for or required by British Transport Police on or near the station

3.0 THE DEFINITION OF THE M.E.N'S PREMISES.

3.1 From the above provisions, the lease as a whole and the attached map it is apparent that the MEN premises includes:

- (i) Arena itself;
- (ii) The Steps leading down to Hunts Bank, including the car park and turning circle in front of the railway buildings directly to the left of the aforementioned steps, up to the bollards by Hunts Bank;
- (iii) The NCP car park;
- (iv) Trinity Way Link.

3.2 However, the operators of the MEN Arena have only ever:

- Paid for officers of this Force when they have made a specific request for policing *inside* of the actual stadium; and
- Stressed that everything outside the aforementioned stadium is the Landlord's i.e. Railtrack (and by extension this Force's) responsibility for maintaining safe access and egress to the stadium. This view is clearly incorrect and whenever officers have to police points (ii), (iii) and (iv) detailed in paragraph 3.1 above, *despite being outside the stadium*, they are clearly policing *within* the MEN Arena's premises as defined within the lease.