**Summary of submission from the Association of Independent Showmen - UK**

“I know a lot of businesses are in the same boat as we keep hearing, but we are not in the same boat we are in the same storm.”

*- Quote from a travelling Showman in response to how we are going to cope during and after this pandemic.*

Andrew Nixon and Robert Wilkinson are directors of the Association of Independent Showmen, a UK-wide trade association set up by independent “travelling Showmen” twenty seven years ago whose primary objective was, and is, to promote and support the maintenance of the fairground and circus community, advise that community and help that community prosper.

The membership base of this association is 1,400 with an average active yearly membership of 390/440 members. AIS have a growing online social media presence where current ‘reach’ is anything from 7,500 – 17,500 travelling showmen and an ‘**Average engagement on reach’ of 16 – 25%; depending on content. AIS regularly consult with other travelling Showmen associations in the UK as well as in Europe. UK associations include – Showmen’s Guild of Great Britain (SGGB), Association of Circus Proprietors (ACP), Amusement Catering Equipment Society (ACES) and** The Society of Independent Roundabout Proprietors **(SIRPS), which makes up 99% of all travelling Showmen in the UK. AIS have also previously consulted and liaised with the United Nations through a meeting of the minority travelling community during a country visit of the** Special Rapporteur on contemporary forms of racism, racial discrimination, xenophobia and related intolerance. **They also connect and consult with other Human Rights NGO’s on issues regarding cultural rights protection for travelling minorities.** There is a significant minority of travelling Showmen that have not bid for any external funding to help support them through this crisis owing to lack of IT skills, lack of confidence in literacy skills and pride. The majority of the governmental support that travelling Showmen are receiving at this time is in the form of the Self Employed Income Support Scheme, Universal Credit and those that have been able to receive some form of grant through the support and skill of their business accountant. While most travelling Showmen believe they are likely to survive this crisis, the majority see the future as unknown. Current support and funding will support them short-term, however many travelling Showmen are now concerned about the period of time between being potentially allowed to operate and the end of the ‘travelling season’. It is unclear how they are expected to survive the winter and preparations for the start of the season before Easter in 2021, if recognition of this plight is not understood, recognised and supported by all stakeholders.

“What have been the impacts on cultural rights and on cultural life\* of:

1. The pandemic?
2. Measures taken to respond to the pandemic?

*\* Cultural rights include the rights to take part in cultural life without discrimination, to access and enjoy heritage, to artistic and scientific freedom, and to benefit from scientific knowledge and its applications. Cultural life includes performing arts, museums, heritage sites, sports and public spaces used for a variety of cultural and social gatherings*.”

According to our understanding, research and information received:

Travelling Showmen in the UK are a historic cultural travelling community whose cultural identity, language and history is closely tied to the idea that the right to enjoy one's culture includes rights to engage in economic activities essential to cultural reproduction - as has been shown by the Human Rights Committee’s willingness in regards to interpreting Article 27 of the International Convention on Civil and Political Rights as protecting some activities that possess non-universal and collective dimensions[[1]](#footnote-1).

While travelling Showmen have been ever present within the UK as far back as the development and introduction of Fair’s from France in the 12th Century as a result of the Black Death reducing workers within the Feudal system, and in so doing allowing people to travel in search of work, it is only since the end of the 19th Century that a formalisation through association and that of technological and scientific knowledge has crystallised the settled societies perception of this travelling community through their facilitation of travelling funfairs, circuses, and such outdoor events involving travelling showmen; traditionally from Easter till November. Today this equates to somewhere in the range of 2,500 to 4,500 businesses, for the main part small family businesses, most with a long history of being travelling Showmen spread over the whole of the UK.

Since 2016, it was proposed and passed by ordinary resolution that, through the Association of Independent Showmen, a recognised professional trade association within the UK two of its Directors – Andrew Nixon, and Robert Wilkinson adopt the role and mandate of what is now known and recognised as Cultural Rights Defenders (A/HRC/43/50) and that they work within the framework of the Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms (Declaration on Human Rights Defenders), in order to pursue the elimination of violations of cultural rights and promote respect for and protection and fulfilment of these rights[[2]](#footnote-2), and to specialise in working to these ends for the UK travelling Showmen community as a whole.

The impact on this community therefore, and the sector of civil society they provide entertainment to, as result of both the pandemic and measures taken to respond to the pandemic in the context described has been devastating. This specifically within the context of (A/74/255 para. 8) - public spaces as places that are publicly owned and accessible to all without discrimination, where people can share in the project of building a common society based on human rights, equality and dignity, where they can find ways to develop *vivre ensemble*, to build what they have in common and to share their common humanity, while still nurturing and expressing their own identities[[3]](#footnote-3). The pandemic and measures implemented has also by extension had a detrimental impact on the livelihoods of all travelling Showmen and their employees. It is also further estimated that so far of the thirteen of the twenty six weeks that travelling Showmen traditionally travel in their season has meant, that of the 28 million residents of the UK that attended an outdoor fair/exhibition/show in 2017 (last available peer-reviewed data)[[4]](#footnote-4) a good third of this figure have not been able to make use of the public spaces for social and cultural interactions among the people of their area and specifically within this traditional cultural practice that is carried out in these public spaces.

“What efforts have been made to guarantee the exercise of cultural rights, in accordance with the requirements of public health? How has the message that cultural life must be enjoyed in ways that respect public health and medical expertise been communicated?”

To answer these questions simply, no effort and no message. That is however, when it is understood that we are answering these questions on these issues as a cultural stakeholder in the exercise of these traditional cultural practices in public spaces, and we accept that we have addressed these specific questions mainly from within the sector and through the perspective of this specific group. It is our understanding that culture is constituted by social practices that change over time (A/HRC/31/59). However, we also understand that sometimes, the exercising of cultural rights can be affected by the requirements of Public Health, i.e. Controlling the virus, and protecting the right to life, means breaking the chain of infection: people must stop moving and interacting with each other. The most common public health measure taken by States against COVID-19 has been restricting freedom of movement: the lockdown or stay-at-home instruction.[[5]](#footnote-5)

The Health Protection (Coronavirus, Restrictions) (England) Regulations 2020[[6]](#footnote-6), which stems from, The Public Health (Control of Disease) Act 1984[[7]](#footnote-7), has legislated for the travelling Showmen community by virtue that they provide “Funfairs” and travelling Circuses by association with Theatres (performing arts) and outdoor events including travelling Showmen through mass gatherings in general to not trade, and to not travel, in order to reduce the rate and to break the chain of transmission through the preventing of these mass gathering events for Public Health reasons from taking place[[8]](#footnote-8).

As has been stressed many times before through the function of the Special Rapporteur, the mandate on cultural rights has been established to protect not culture and cultural heritage per se, but rather the conditions allowing all people, without discrimination, to access, participate in and contribute to cultural life through a process of continuous development (A/71/317 para 13)[[9]](#footnote-9). This condition has not been communicated publically to civil society in any format or any understanding of the significance of cultural rights during the pandemic, but has been discussed indirectly and by inference by Public Health officials, the UK government and expert medical and behavioural opinion and then left to the choice of interested parties to source and access this information online after the policy decisions have been made without prior consultation/ involvement/ or notification of “stakeholders”[[10]](#footnote-10). This approach and decision making process being justified by the State through the powers conferred on the UK government by sections 45C, 45F and 45P  of the Public Health (Control of Disease) Act 1984.

It is because of this, and is based on knowledge of this, which is the reason for the impression we gave initially as to this aspect of cultural rights contained within these questions.

“What roles have culture and cultural rights played in responding to the pandemic:

1. At the individual and collective levels, including in building resilience and solidarity, and memorializing victims?
2. At the scientific level, to provide adequate information to inform public policy and ensure public awareness?
3. In any other relevant manner?”

In answering this question holistically within the three parameters requested. The right of minority groups to enjoy their own culture, and to use their own language, means for travelling Showmen during the season that these public spaces perform the role of a “cultural hub” for the community i.e. a place where travelling Showmen and Showmen of heritage can meet, work and enjoy their own culture; use their own language. Within the current restrictions, and in that travelling Showmen have an innate resilience to ‘adapt to stay the same’ within their culture, their ability to replicate this cultural hub within their ‘yards’, in fact, only depends on how many travelling Showmen families share these yards collectively. Therefore when viewed as a general prohibition on the economic activities of travelling Showmen, there is nothing in the Public Health Regulations that would prevent the community from practicing this cultural hub elsewhere, either individually, or collectively, so long as this remains confined to the ‘yard’- the current location of their homes.

We would like to note however, that this sole economic assumption by the UK authorities misconstrues the nature of the obligations of the United Kingdom under article 27 of the International Covenant on Civil and Political Rights relating to the rights of persons belonging to minorities not to be denied “the right, in community with the other members of their group, to enjoy their own culture, to profess and practice their own religion, or to use their own language”, and under article 15, paragraph 1 (a), of the International Covenant on Economic, Social and Cultural Rights relating to the right of everyone to take part in cultural life. This is noted and highlights specifically with regards to solidarity, and memorializing victims during this “public health response period” in accordance with cultural tradition and heritage of this community. As stressed by the Committee on Economic, Social and Cultural Rights in its General Comment 21 on the right to take part in cultural life, article 15, (1) - (a), of the Covenant includes the right of persons belonging to minorities “to conserve, promote and develop their own culture” and entails the obligation of States parties “to recognize, respect and protect minority cultures as an essential component of the identity of the States themselves” (E/C.12/GC/21, paragraph 32).

It is here that lie’s the fundamental issue. As far as these issues of solidarity and memorializing, as well as points (b.) and (c.) are concerned - the concept of culture and cultural rights, not only for travelling Showmen, but for all of civil society in the UK irrespective of the diversity of sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status in responding to the pandemic - is that the impact of the measures implemented through the powers granted by the Public Health (Control of Disease) Act 1984.with regards to the introduction of The Health Protection (Coronavirus, Restrictions) (England) Regulations 2020 on these specific rights is, they were not taken into consideration – “No impact assessment has been prepared for these Regulations.”[[11]](#footnote-11)

“What steps have been taken to mitigate the impacts of the pandemic, and of measures to counter the pandemic, on the cultural sector and on the human rights of those working in it (including artists, athletes, cultural heritage professionals, cultural workers, librarians, museum workers and scientists)?

1. How have the cultural sector and those working in it adapted to the pandemic? How have these adaptations been received by the public and how have they been supported, including financially? Are there sectors of the population that may risk exclusion from such adaptations?
2. What kind of measures will be necessary to rebuild the cultural sector going forward? How will inclusion be addressed?
3. Has your Government already envisaged / announced specific measures to support the culture sector during and after the pandemic? How will relevant constituencies participate in their development and implementation?”

While we do not wish to prejudge the accuracy of our response to this question, we feel that this is the place within this questionnaire for the need to raise and express concerns about the gentrification project within the cultural sector of the UK and the current understanding of cultural rights in all interpretations of this term which, if followed through by the current policies of the UK government, would result in the demise of the current relationship and acceptance of travelling Showmen from the places where they live and secure their livelihoods, and would have a deleterious impact on the dynamic cultural life of this particular section of the wider travelling community.

Generally speaking, and in line with the underlying economic policy of the UK government – commonly known as “UK pLc”[[12]](#footnote-12) - all aspects of civil society, including culture have been mobilised to this end. Therefore in response to the initial part of this question, the mitigation steps during this pandemic by State actors has been primarily focused on the protection of life balanced with the economy, with the dissemination of this fact through normal channels of communication.[[13]](#footnote-13) This has been reinforced through the “Stay at Home, Protect the NHS and Save Lives” campaign.[[14]](#footnote-14)

With regards to the measures in countering the pandemic within the context of human rights, it is of our opinion that the right to an effective remedy within the cultural sector as a whole, and specifically in regard to travelling Showmen claiming that right as a cultural travelling minority – that is, an effective remedy - owing to the fact that the majority of financial support, in a business context is being based on an eligibility criteria of a ‘fixed property location’[[15]](#footnote-15); even within the parameters of a discretionary fund[[16]](#footnote-16) has had the greatest impact and is being seen as discriminatory due to the fact that travelling Showmen in the exercising of the right to work do not have a permanent ‘fixed’ property location –their work location is peripatetic in nature.

It is our understanding that this, as quoted in the question above, “Are there sectors of the population that may risk exclusion from such adaptations?” means that in accordance with Article 9 of the Declaration on Human Rights Defender, everyone has the right to benefit from an effective remedy and to be protected in the event of the violation of his/her human rights and fundamental freedoms. States therefore have a responsibility to ensure that human rights defenders whose rights have been violated are provided with an effective remedy (A/65/223, para. 44).[[17]](#footnote-17)

Furthermore, in the exercise of paragraph 3 - To the same end, everyone has the right, individually and in association with others, inter alia: and specifically section (a) To complain about the policies and actions of individual officials and governmental bodies with regard to violations of human rights and fundamental freedoms, by petition or other appropriate means, to competent domestic judicial, administrative or legislative authorities or any other competent authority provided for by the legal system of the State, which should render their decision on the complaint without undue delay[[18]](#footnote-18) has so far been ignored; both in no response being given or by ignoring the context of the complaint in the response returned.

In connection with the above questions, (b) and (c) and the concerns raised about the gentrification project within the cultural sector of the UK and the current understanding of cultural rights in all interpretations of this term, the genuine fear and anxiety of travelling Showmen as a community is that there will be, and is, no inclusion - as no travelling association has been invited to participate in the development and implementation of specific measures to support this specific culture sector during and after the pandemic. This in our belief is due to two reasons.

1. The understanding and interpretation of Cultural heritage
2. The UK government’s view that travelling Showmen are not a recognised travelling cultural minority with no protected characteristic, nor contribute or are seen as being part of the cultural sector.

The human rights understanding of “cultural heritage”

According to paragraph 6 of (A/71/317) - Cultural heritage is significant in the present, both as a message from the past and as a pathway to the future. Viewed from a human rights perspective, it is important not only in itself, but also in relation to its human dimension; in particular its significance for individuals and communities and their identity and development processes (see A/HRC/17/38 and Corr.1, para. 77). Cultural heritage is to be understood as encompassing the resources enabling the cultural identification and development processes of individuals and groups, which they, implicitly or explicitly, wish to transmit to future generations (ibid., paras. 4-5). It is critical to emphasize the connections between culture more broadly and cultural heritage, and to recognize cultural heritage as living and in an organic relationship with human beings. This encourages its preservation and discourages its destruction.[[19]](#footnote-19)

The UK governments understanding of “cultural heritage”

On 5 May 2020, the parliamentary under secretary at the Department for Digital, Culture, Media and Sport, Nigel Huddleston, stated that the Government had held “multiple recent discussions” with tourism businesses on developing guidance to help facilitate the re-opening of businesses. However, the Government would “continue to be guided by the latest medical advice”. Further, on 11 May 2020, the Government published its Covid-19 recovery strategy[[20]](#footnote-20). In the strategy, the Government stated that its ambition was to open some leisure venues no earlier than 4 July 2020. In this document on a recovery strategy no mention is made of culture, or cultural heritage.[[21]](#footnote-21)

The UK government’s stance on cultural heritage has always been on ‘tangible’ assets, buildings, museums and places of significant heritage. The financial support in general within this ‘heritage’ sector is only offered to ‘stakeholders’ that have had previous support, and that no new submissions are being received during this emergency health period.[[22]](#footnote-22) Therefore, taking this answer forward, in regards to point (c) of this question and the second point of our belief for what reasons this exclusion of participation of travelling Showmen is occurring during and after this pandemic with regards to rebuilding the cultural sector – we believe that:

In the UK governments published report, Industrial Strategy Tourism Sector Deal Building a world-class experience economy[[23]](#footnote-23) it states, “The United Kingdom is rich in cultural heritage; it offers landscapes of outstanding natural beauty as well as vibrant city life and urban attractions” does not take into consideration the intangible aspect of cultural heritage. This explained by the fact that for a community that travels, these ‘public spaces’ are also a place where people of different generations of travelling Showmen meet, where neighbourhood children gather and play around this specific temporary cultural hub, and where an array of social and cultural activities are regularly shared.

It is experienced by travelling Showmen as traders and residents as a cultural centre that offers opportunities for cultural exchange, intergenerational dialogue, and social support. Overall, it is a place that offers travelling Showmen a sense of belonging and value.

However, by way of example, in the HOUSE OF LORDS Select Committee on Regenerating Seaside Towns and Communities, where a lot of travelling Showmen travel during the season, in their chapter “A vision for seaside towns” –

“When we think of the seaside, what images does it conjure in our minds? For many of us, the seaside brings back fond childhood memories. Tinted with sepia, it provokes remembrances of endless sunshine, ice creams, and funfair rides, slot machines, playing in the sand and skipping carefree into the water..... The seaside of the 1950s and 60s, with their last hurrah for holidays without a flight to a far-flung destination, is a place that no longer exists. The British seaside is now just one of a number of destinations we can choose to take a break... Our Committee, in looking at the issues facing today’s seaside towns, visited many of the traditional old style ‘bucket and spade’ resorts to learn how they were coping and see how they were re-inventing themselves for the future.”[[24]](#footnote-24)

Furthermore, in the ‘Select Committee on regenerating seaside towns and communities’ – Oral Evidence Volume – and in answer to the question, “Perhaps you could describe the role the attractions and amusement industry plays in supporting seaside economies. Perhaps give us a feel for what the industry does.” The answers given and supplied were by associations representing fixed businesses in these coastal areas, and no evidence given – or reference made - to the travelling Showmen community and the contribution and value brought to these areas within this context.[[25]](#footnote-25)

While such redevelopment and regenerating projects does not entail a prohibition for the travelling Showmen community members to enjoy their own culture with other members of their group, or is seen as a deliberate denial of such rights, it may however constitute a significant obstacle to the realisation of these rights should the “regeneration arrangements” or the socio-economic and/or infrastructural conditions in the ‘vision of seaside towns’ currently under discussion interfere with their cultural life or fail to facilitate the preservation of their culture, for example by the preservation or replication of this “cultural hub” within the seafront of these towns; and not on their outskirts.

Which brings us back to the point that, in the UK government’s view, travelling Showmen are not a recognised travelling cultural minority with a protected characteristic requirement for active consultation, nor do they contribute, or are seen as being part of the cultural sector by the UK governments department for culture media and sport (DCMS); but are instead seen as being part of tourism by virtue of the economic value added contribution they make to the Treasury – by civil society visiting the attractions of travelling funfairs, circuses, and outdoor events including travelling Showmen. The travelling community that provide these services are overlooked.

It is our understanding that, in this regard we have the right to inform that, the UK government have the obligation not only to respect the cultural rights of persons belonging to this community, a cultural travelling minority but also to adopt measures to protect and fulfil these rights. As noted in General Comment 21 by the Committee on Economic, Social and Cultural Rights, the right of everyone to take part in cultural life imposes three levels of obligations on States parties: “(a) the obligation to respect; (b) the obligation to protect; and (c) the obligation to fulfil the right to take part in cultural life.

As is known, the obligation to respect requires States to refrain from interfering, directly or indirectly, with the enjoyment of this right. The obligation to protect requires States to take steps to prevent third parties from interfering in this right. Lastly, the obligation to fulfil requires States to take “appropriate legislative, administrative, judicial, budgetary, promotional and other measures aimed at the full realization of the right” (E/C.12/GC/21, paragraph 48).

This claim however is not being recognised, nor addressed by the UK government in any form. This means that in line with the UK government policy of ‘UK plc’ has led to the government’s approach of announcing specific measures to support the culture sector during and after the pandemic through the formation of a ‘taskforce’[[26]](#footnote-26) within the DCMS, which, while a member of this taskforce has a travelling Showmen heritage, it is because of their economic value added credentials as an “Events Group” business, both Nationally and Internationally that is the reason for their inclusion. Furthermore, the working sub groups[[27]](#footnote-27) do not contain representatives of the travelling funfair sector, though they do include representatives of the travelling circus sector by virtue of their SIC 2007 code being that of the performing Arts – culture[[28]](#footnote-28)

For these reasons explained it is our impression that this is the reason that there has been no invitation, participation and development of measures during and after the pandemic, and that if we wish to contribute further ideas to their work we do this through a general enquiry.

“Have scientific and medical experts been able to express themselves freely about the pandemic, its impacts and needed responses? What measures have been taken to address the denial of scientific information about the pandemic, and to ensure access to reliable scientific information to guide policy making and personal choices?”

Have scientific and medical experts been able to express themselves freely about the pandemic, its impacts and needed responses? – Yes.

What measures have been taken to address the denial of scientific information about the pandemic, and to ensure access to reliable scientific information to guide policy making and personal choices?

This has been done primarily through advocacy groups, governmental departments and by a general policy of transparency from the government, until the situation with the special advisor to the Prime Minister; Dominic Cummings broke within the UK. Since then the level of confidence and trust in the government and the information it has released in relation to this question has fallen sharply.

1. U.N. Hum. Rts. C’tee, Kitok v. Sweden, U.N. Doc. CCPR/C/33/D/197/1985 (Aug. 10, 1988) [↑](#footnote-ref-1)
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26. <https://www.gov.uk/government/news/culture-secretary-announces-cultural-renewal-taskforce> [↑](#footnote-ref-26)
27. <https://www.gov.uk/government/groups/cultural-renewal-taskforce-and-supporting-working-groups> [↑](#footnote-ref-27)
28. <https://www.siccode.co.uk/sic2007/code-90020> [↑](#footnote-ref-28)