North Yorkshire Council

Urban Gull Study

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Definition of Acronyms

Term	Definition
ANS	Artificial Nesting Structure
AON	Apparently Occupied Nest
AEoSI	Adverse Effect on Site Integrity
BoCC5	Birds of Conservation Concern 5
BTO	British Trust for Ornithology
DCO	Discharge Consenting Order
ES	Environmental Statement
HRA	Habitats Regulation Assessment
IUCN	International Union for Conservation of Nature
JNCC	Joint Nature Conservation Committee
NE	Natural England
NYC	North Yorkshire Council
OWF	Offshore Wind Farm

RSPB	Royal Society for the Protection of Birds
SMP	Seabird Monitoring Programme
SPA	Special Protection Area
UGS	Urban Gull Strategy

Executive summary

Urban gulls, particularly Herring Gulls (*Larus argentatus*) and Kittiwakes (*Rissa tridactyla*), are increasingly present in North Yorkshire's coastal towns - Scarborough, Whitby, and Filey. While protected under UK law and of growing conservation concern, their presence in urban environments poses challenges including noise, fouling, and human-wildlife conflict.

This study produced by North Yorkshire Council (NYC), will balance legal and ecological responsibilities with the need to maintain clean, safe, and welcoming urban spaces. The study is rooted in evidence from local studies, stakeholder consultation, and national conservation data, and aligns with obligations under the Environment Act 2021. Interaction of gulls and bathing water falls outside the scope of this study.

Aims of the Urban Gull Study

1. Promote and sustain healthy gull populations.
2. Provide clean and safe environments for residents and visitors.
3. Implement sustainable measures to enable coexistence between gulls and people.

Summary findings from the consultation

A targeted consultation with 102 stakeholders revealed:

- Strong support for education, signage, and waste control.
- Divided opinions on proofing and visual impact of gulls.
- Recognition of gulls as part of coastal character, but concern over aggressive behaviour and fouling.

Associated studies and learnings

- A feasibility study supports the installation of Artificial Nesting Structures (ANS) to relocate Kittiwake colonies from sensitive urban sites.
- Lessons from other towns, such as Lowestoft, demonstrate the value of coordinated cleaning and conservation efforts.

Strategic Approach: Five pillars of action and management

This study proposes a shift from reactive control to proactive coexistence, focusing on five core pillars of management and underpinned by Planning Policy and Control for the strategy:

1. Education and Communication
   - Develop consistent messaging to raise awareness of gull ecology, legal protections, and NYC's management goals.
   - Engage residents, businesses, and tourists through signage, media, and campaigns.

2. Waste Management
   - Improve use and enforcement of gull-proof waste sacks.
   - Address commercial waste practices and hotspots for gull scavenging.

3. Cleaning Services
   - Maintain and expand seasonal jetting of guano hotspots.
   - Engage landowners to share responsibility for cleaning adjacent areas.

4. Proofing
   - Encourage professional installation of deterrents (netting, spikes, Avi-Shock).
   - Highlight risks to bird welfare and need for ongoing maintenance.

5. Monitoring and Evaluation
   - Support annual Kittiwake surveys and periodic Herring Gull counts.
   - Track effectiveness of management measures and public attitudes.

Planning Policy development

An ambition of the Study is to assist in developing corporate policies within the new Local Plan for North Yorkshire for the management and coexistence of urban gulls. Policy can identify zones where it is acceptable to include passive provision for artificial nesting sites (ANS) on new buildings and building locations where the design can actively deter nesting of urban gulls

Financial and legal considerations

There will be ongoing new revenue costs (and some initial capital costs) for seasonal additional jetting, the provision of gull proof sacks and litter bins (new and retrofitted), signage and education/communication activities. This will be funded from the Environment Directorate's in-year budget

The Council must comply with the requirements of the Wildlife and Countryside Act 1981, which affords protection to gulls as wild birds and the Environment Act 2021 to promote biodiversity. Enforcement action particularly in for non-compliance with waste management standards will be carried out proportionately and in accordance with the Councils Enforcement Policy and the Regulators Code.

1.0 Background

1.1. Study purpose

The requirement to develop an Urban Gull Strategy (UGS) was agreed by the North Yorkshire Council (NYC) Environmental Executive Members at a meeting on 1st November 2024 following presentation of the proposed aims and objectives (North Yorkshire Council, 2024). This study has been carried out to inform the formulation of an UGS for the Council.

Urban gulls are present within the local authority area in Scarborough Town, Filey and Whitby. Predominantly Herring Gull *Larus argentatus*, a large gull species, is present throughout the town(s) where it breeds in a variety of nesting places during the summer but is also present all year round and relatively widely distributed. In addition, in Scarborough, Kittiwake, *Rissa tridactyla*, a small pelagic gull species is also present during the summer months only, where it too breeds, albeit in relatively more discreet colonies and areas closer to the sea.

Whilst all gull species are wild birds and protected under UK law (Wildlife and Countryside Act, 1981), their growing number in urban areas presents challenges for local authorities throughout the country. Their growth in urban population size is contrary to their wider and significant population declines (Burnell, D., et al., 2023).

Adored by some and loathed by others, the presence of urban gulls can be divisive (Deering, B., 2017). Gulls do pose real challenges, in particular around the mess they create from fouling, nesting and noise (Raghav, S. and Boogert, N.J., 2022). In addition, from Herring gulls, there are often unwanted interactions with people. Such interactions and the impacts of fouling and noise pollution require careful consideration and management so that they are reduced, mitigated or where possible avoided. Such measures are likely to include the need for greater education, proofing, waste management, cleaning and monitoring.

Given gull species protection, increased conservation status and the need for local authorities to protect and enhance biodiversity under the Environment Act (The Environment Act 2021), this study focusses on measures that will enable co-existence through considered management and the formulation of a strategy. This is consistent with the previously agreed aims:

- To promote and sustain a healthy population of all gull species.
- To provide and sustain a clean and safe place for residents of the coastal areas.
- To identify and implement suitable and sustainable measures to enable gulls and the public to successfully co-exist in the coastal areas.

1.2. Urban Gull Management in the UK

Throughout the UK and elsewhere there has been a significant rise in urban gull populations (Burnell D., et al., 2023). The reasons for these rises have been linked to pressures in their natural environment, including declining prey availability (fish stocks) or changes in their natural nesting habitat and increased pressures from disturbance and predation (Beasley, E., 2017). By comparison to their traditional nesting habitats urban areas provide both relatively safe nesting opportunities, free from predation and offer access to new food resources, that is, human waste food (Goumas, M et al., 2024).

The presence of gulls in urban areas does pose real challenges because of noise, fouling and at times unwanted interactions. In Scotland these pressures resulted in the Scottish Executive commissioning a national review (Calladine, J.R., et al., 2006). Consequently, there have been many attempts to manage populations, either by reducing population sizes through culling, egg and nest removal or other lethal and non-lethal deterrent methods such as proofing, however many of these have not been deemed to be successful (Rock, P., 2005 and Rock, P., 2012). Historically many of these methods have been used in the towns of East Yorkshire (Ayrton, W.R., 2000). Equally the challenge of seeking to manage urban gulls has been regarded as a vicious circle if efforts are focussed solely on regulating the gulls and in turn by regulating people in the name of regulating gulls and therefore requires a new way of thinking if people and gulls are to coexist (Trotter, S., 2019).

Changes to both gulls' increased conservation status and the stricter licensing of control methods by statutory conservation bodies (in England, Natural England) mean that lethal methods of control are now unlikely to be granted with updated advice now much more restrictive (Natural England, 2021). Consequently, new approaches to the management of urban gulls are required which are likely needed to be focussed on an acceptance of their presence and co-existence with human populations (Belant, J.L., 1997).

Within the UK several breeding gull species and a greater number of non-breeding species are present throughout the year (Burnell, D., et al., 2023). Principally for North Yorkshire the gull species present are Herring gull and Kittiwake. Whilst Kittiwake is only present as a breeding species during the summer months in Scarborough town, the Herring gull is present all year round in Scarborough, Whitby and Filey (Stone, J.M., 2019).

1.3. Understanding the gull species most abundant in NYC coastal towns

A physical description of Herring Gull and Kittiwake

Herring Gull

Herring Gull is a large gull species (adult weight 0.76 -1.26 kg, wingspan 1.5m), present all year round, that is, during both the breeding season (summer) and non-breeding season (winter) (Coulson, J.C., 2016). Adults have light grey backs, white under parts, and black wing tips with white 'mirrors'. Their legs are pink with webbed feet, and they have heavy, slightly curved bills marked with a red spot. Young birds are mottled brown Figure 1. On average Herring gull have a lifespan of 12 years and breed from age four or five. They lay once each year and have an average clutch size of between 2-3 eggs, albeit a typical breeding pair only successfully raise one young bird per year.

Figure 1: Adult Herring gull (top) RSPB 2025, juvenile Herring gull (bottom left) Avon Birds 2016, adult Herring gull feeding (bottom right) Essex Live 2019

Kittiwake

Kittiwake is a small gull species (adult weight 310 - 434g, wingspan 0.9m), present only during the breeding season (March to August) in urban areas, spending the remainder of the year in the non-breeding season at sea (Coulson, J.C., 2011 and Coulson, J.C., 2016). Kittiwakes are gentle-looking, medium-sized gulls with a small yellow bill and a dark eye. They have a grey back with white underneath. Their legs are long and black. In flight, the black wingtips show no white, unlike other gulls, and look as if they have been 'dipped in ink' Figure 2.

On average Kittiwake also have a lifespan of 12 years and breed from age four, laying once in any year. Whilst they have an average clutch size of two eggs, a typical breeding pair only successfully raise one young or less per year. Long-term declines in their breeding productivity are a cause of conservation concern with many pairs failing to successfully raise any young each year (RSPB, 2025).

Figure 2: Adult Kittiwake with chick (top) RSPB, 2025, juvenile Kittiwake in flight (bottom left) Joel G Jorgensen 2009, adult feeding (bottom right). David @theHALLofEINAR 2025.

Herring Gull and Kittiwake: relevant ecological differences in feeding and nesting behaviour

Apart from their size and nesting habits the most significant distinction between Herring gull and Kittiwake is their choice of prey and food resources. Kittiwake feed exclusively in the marine environment, predominantly on energy rich prey such as sand eels, especially during the breeding season when they are provisioning for chicks. Adult Kittiwake will forage at sea typically between a few kilometres or within a 60km radius of their nest site, with distances far in excess of these also recorded. They will feed on their chosen marine prey and on returning to a nest regurgitate partly digested prey into the mouths of their chicks. Kittiwake do not feed within the urban environment or on any form of human waste and consequently do not come into close contact with people.

By contrast, Herring gull is a highly adaptable species, and they are opportunistic feeders with diets ranging from fish and crustaceans to human refuse and food waste. Historically Herring gull have also fed on food resources at refuse tips and on fishery discards at sea, however both these food resources are no longer widely available due to changes in landfill management and fisheries policy. Not all Herring gulls present in an urban environment will feed on human waste, with tagging studies showing that many will still choose to feed at sea whilst nesting in a town. However, many Herring gulls do feed on food resources within towns, and this brings them into close proximity with people. Encouraged by an abundance of food resource availability Herring gull learn to associate the presence of people with opportunities for food and over time individual birds may be ever more confident of seizing such opportunities.

Whilst it is apparent that Herring gulls may on occasion take food from people, whether that be a sandwich or fish and chips left unattended or on rare occasions snatched from people's hands they are not necessarily aggressive or cause any direct harm. However, there is an annual trend within the media to in part sensationalising such incidents and referring to large gull species as 'mugging' or 'attacking' people. Such reporting has the potential to polarise opinions and attitudes towards gulls further and is rarely accompanied by sound evidence or offers a balanced opinion about the species as wild birds and the challenges they face at a population level.

Herring Gull and Kittiwake: Relevant differences in population size and distribution, nationally and locally.

Herring gull

The breeding population of Herring Gull in Britain and Ireland reported following the most recent population census and estimate, 'Seabirds Count' (2015-2021) was the lowest recorded, representing a 41% decline since the prior census and a 78% decline since the first census, 'Operation Seafarer' (1969-1970) (Burnell D., et al., 2023). In England this decline is even greater

than the national average with an estimate of 11,736 Apparently Occupied Nest (AON) or pairs, representing a 60% decline between censuses.

Locally, based on a study commissioned by the former Scarborough Borough Council the estimated number of breeding Herring gull AON in Scarborough town was 761 pairs in 2018 and 802 pairs in 2019. In the same study a further 234 pairs were also estimated to be breeding in the town of Whitby (Stone, J.M., 2019). No counts or estimates were commissioned for Filey during the 2018-2019 study.

The 2018 and 2019 estimates available for Scarborough and Whitby were relatively consistent with the prior census estimates reported in Seabird 2000 where 870 AON were reported in Scarborough and 528 AON in Whitby (Mitchell P.I., et al., 2004) and are therefore likely to be at least relatively stable.

Further estimates documenting the more significant rise in urban gull populations during the 1970s to 1990s are documented for the towns of Scarborough, Whitby, Filey, Staithes and Robin Hood's Bay (Ayrton, W.R., 2000).

It is of note to recognise and remember that in addition to breeding adults, that is, estimates of the number of pairs of Herring gull, there will also be significant numbers of non-breeding adults and sub-adults (aged less than 4 years) for which there are currently no population estimates. Herring gull breed in both natural and urban habitats, the former including cliffs, moorland, agricultural land and islands. Consequently, whilst present in coastal towns, their distribution in towns extends inland and can be widespread across the urban area, including individual nests sited among chimney pots Figure 3. Across both Scarborough and Whitby towns Herring gulls were recorded across several square kilometres of the town(s). This is clearly demonstrated by results of the 2019 urban Herring gull study in Figure 4 and Figure 5 Figure *4*.

Figure 3: Herring gulls nesting on roofs and between chimneys in urban environments.

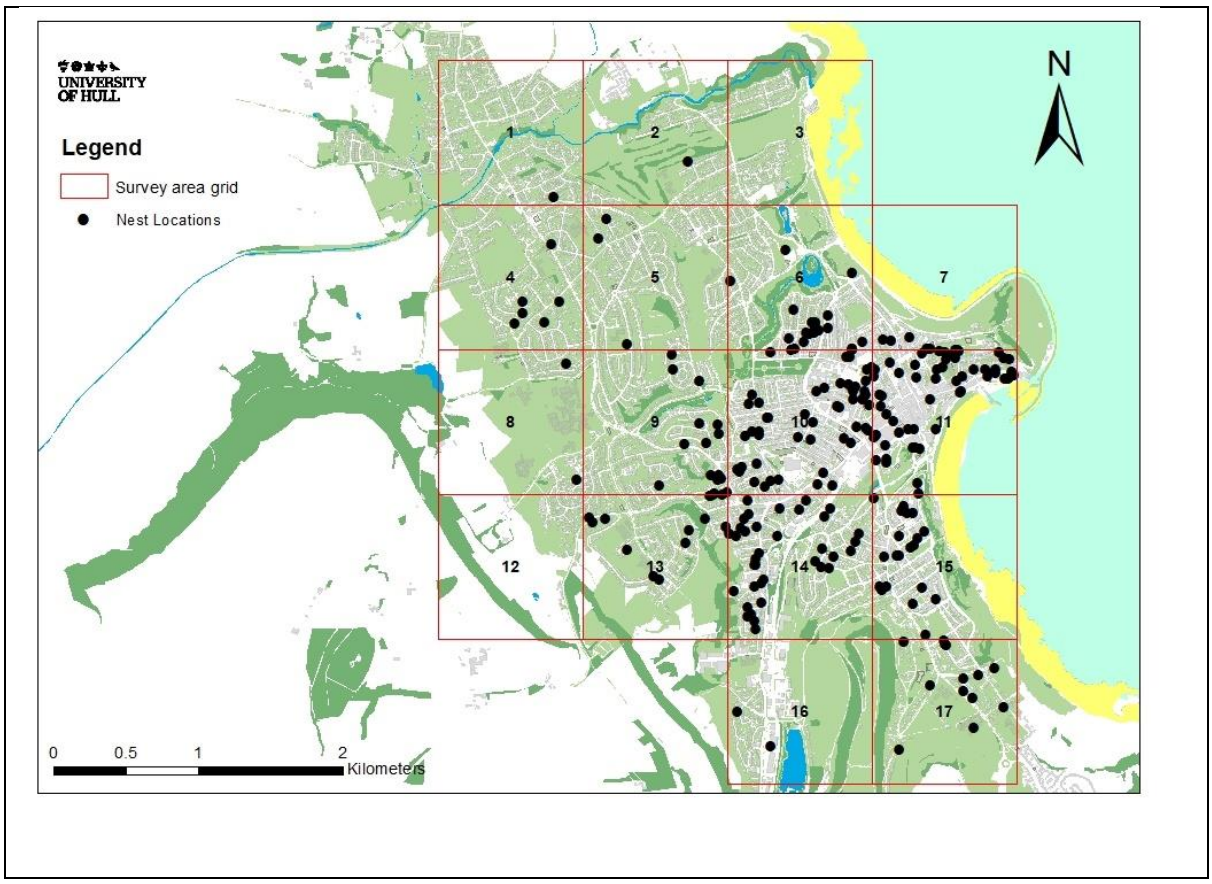


Figure 4: Nesting locations of Herring gull in Scarborough Town 2019.

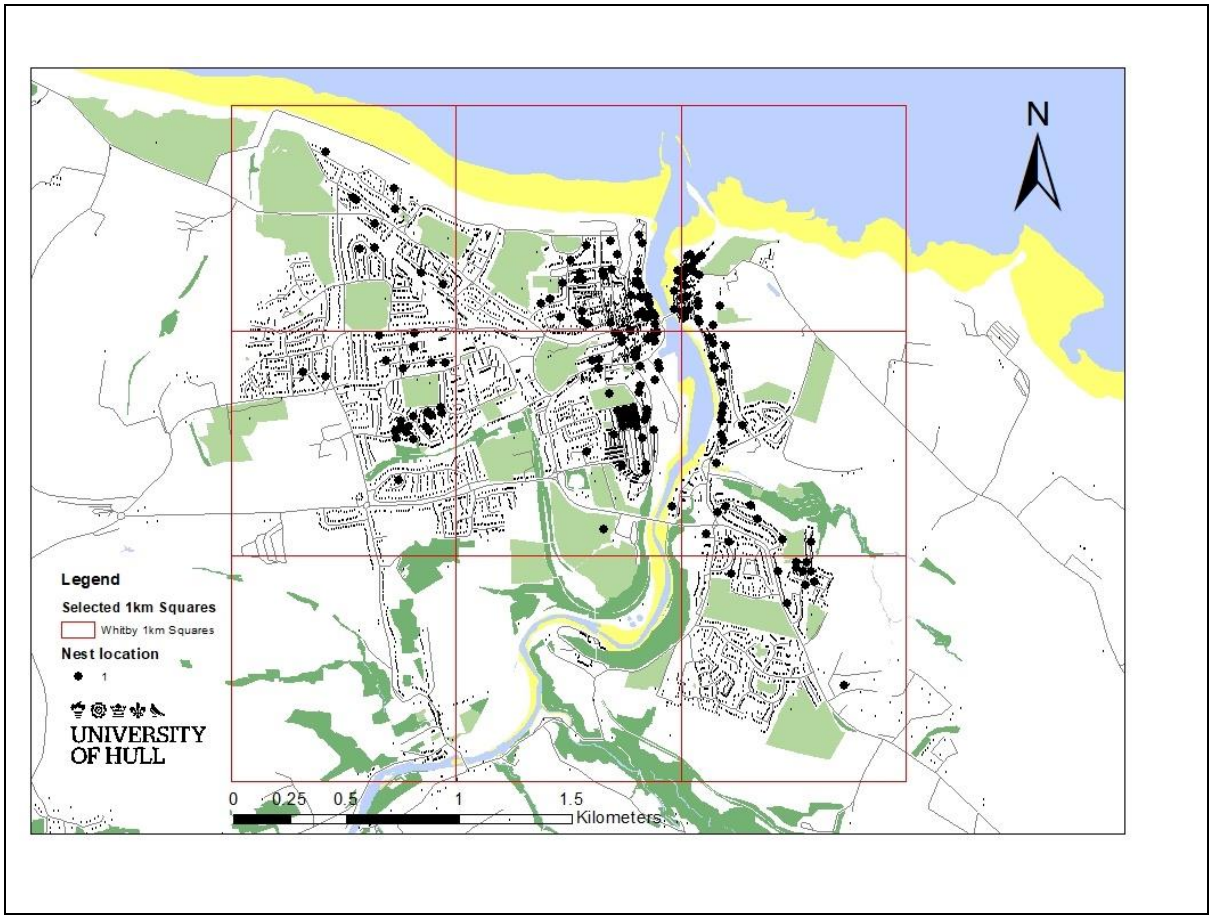


Figure 5: Nesting locations of Herring gull in Whitby Town 2019.

Kittiwake

The breeding populations of Black-legged Kittiwake in Britain and Ireland reported following the most recent population census and estimate, 'Seabirds Count' (2015-2021) was the lowest ever recorded and represented a 42% decline since the prior census (Burnell D., et al., 2023). Whilst the population decline was greatest in Scotland, England's population, estimated to be 72,987 AON (pairs) also declined by 4% between censuses.

Locally, the only town in which Kittiwake breed is Scarborough where the most recent 5-year mean population estimate is 950 AON (pairs), which combined with the estimate for Scarborough Cliffs and the Castle Headland of 1,338 AON (pairs) represents a total of 2,288 AON (pairs). This total is the equivalent of 0.95% of Britain and Irelands most recent population size estimate for breeding Kittiwake. Kittiwakes are highly colonial, breeding in close proximity to each other and often side by side along cliff ledges or man-made structures Figure *6*. Kittiwake also choose to nest within close proximity of the sea and ideally overlooking open water. The desire to be close to open water is partly as a result of the requirement to minimise effort when gathering their favoured nesting material, seaweed from the foreshore and rocks.

Figure 6: Kittiwake nesting on natural cliffs (left) and man-made structures; building ledges on the Baltic Flour Mill, Gateshead (right).

Consequently, there are within Scarborough town several sub-colonies, that is, colonies which can be defined by a discreet location and grouping. These sub-colonies are all relatively close to the sea with many and some of the largest (The Grand Hotel and Spa Bridge colonies) overlooking the sea. Spatially Kittiwake colonies within Scarborough Town are limited to ~1km square and within 500m of the foreshore, being far more concentrated in distribution by comparison to the wide distribution of Herring gull. This is evident in the recent mapping of colonies by local recorder, Nick Addey Figure 7.

Figure 7: The spatial distribution of breeding Kittiwake in Scarborough town, 2024. Existing colony locations (red), new colony locations (green) and prior year abandoned colony locations (yellow).

The Grand Hotel is the largest sub-colony of Kittiwake in Scarborough Town, with a reported 663 AON in 2024. Based on *pers. comms* with Nick Addey, the local recorder, it is understood that the total of 663 AON includes several nests on an adjacent wall and that the precise number of AON on the Grand Hotel in 2024 was 607 AON. This total can be further broken down to include totals for each of the hotel's four sides as follows: North side 237 AON, East side 196 AON, South side 73 AON and West side 101 AON. For Kittiwake the Grand Hotel is likely to represent a sandstone cliff with perfect ledges and vantage for prospecting Kittiwake seeking to build nests and breed. The most recent, that is the annual sub-colony counts for the last five years (2020-2024) for Scarborough town and for the Scarborough Cliffs, Castle Headland are shown in **Error! Reference source not found.**.

Table 1: The annual number of Kittiwake AON recorded by sub-colony location in Scarborough Town, 2020-2024

Sub-colony location	**SMP location**	**2020**	**2021**	**2022**	**2023**	**2024**	**5 Year Mean**
Scarborough Town							
Grand Hotel	85550	293	422	601	612	663	518
Spa Bridge	85551	263	270	270	189	187	236
Huntress Row	110383	98	108	129	146	172	131
Royal Hotel	110381	34	53	38	59	91	55
Town Hall	101103	96	49	26	23	10	41
Harbourside Houses	83060	10	26	32	37	52	31
Old Britania Inn	101104	10	23	6	26	45	22
Nelson Pub / foreshore	85552	32	16	34	13	0	19
Sandside	110382	8	-	-	-	-	3
Sea cadets	101105	2	2	-	-	-	1
Sub-total		846	969	1,136	1,105	1,220	1,1055
Scarborough Cliffs							
Castle Headland	83059	1,772	1,963	1,897	1,633	1,385	1,730
Total		2,618	2,932	3,033	2,738	2,605	2,785

1.4. The conservation status and protection of gull species

All wild birds in the UK are protected under the Wildlife and Countryside Act, 1981 (as amended). The Act protects wild birds, their eggs and nests by making it an offence to kill or injure birds and or eggs and to remove or destroy their nests during use or being built.

N.B. Nests can be removed during the non-breeding season when not in use.

Specifically, both Kittiwake and Herring gull are UK Birds of Conservation Concern (BoCC5) red-listed species, due to significant and sustained declines in their breeding population sizes (Stanbury, A., et al., 2021). Additionally, Kittiwake is classified as Vulnerable (VU) to the threat of extinction within the International Union for Conservation of Nature (IUCN), again due to international declines in its population size (BirdLife International, 2018).

In addition, a further consideration regarding the development of an urban gull strategy is the responsibility of local authorities to protect and enhance biodiversity under the Environment Act 2021 (The Environment Act 2021).

2.0 Methods

2.1. Approach

Several steps have been undertaken to produce this study from which a series of evidence-based recommendations are made. These steps include undertaking a local consultation, reviewing prior studies and previous gull management practices and undertaking new reviews of the effectiveness of existing management practices. A summary of these is listed below, with scope of each described in this Methods section and the findings of each shared in the Results section.

Consultation

North Yorkshire Council urban gull study consultation (March 2025).

Review of prior evidence

A report for Scarborough Borough Council: Urban Gull Monitoring: 2018 to 2019. An assessment of the town(s) population of Herring Gull (Larus argentatus), their distribution and the effectiveness of a managed 'dispersal and disruption program'. Survey results 2019. Institute of Estuarine and Coastal Studies (IECS), University of Hull.

Review of current practices

North Yorkshire Council gull grant proofing scheme (2019-2025). A review of the effectiveness of implemented measures following a street-based assessment in 2025.

Incorporation of recent feasibility studies

A report for North Yorkshire Council: Black-legged Kittiwake Artificial Nesting Structure (ANS) feasibility study 2025

Consideration of other factors

Scarborough South Bay bathing water quality standards

Liaison with stakeholders

Throughout the production of this study the Council has also sought to liaise with key stakeholders including Regulatory Services (Environmental Protection and Environmental Enforcement) and Waste Operations and Street Scene (Environment Directorate), and the Yorkshire Coast Urban Gull Partnership. To support this process NYC also commissioned the support of an independent self-employed ornithologist, Matthew Stone.

2.2. Urban Gull Study consultation

In March 2025 North Yorkshire Council consulted with a target list of interested to parties to help assess the attitudes, potential impact and possible management measures that are under consideration as part of its gull study.

A questionnaire was sent to businesses and organisations that operated in and around the areas of Whitby, Scarborough and Filey. This included individuals and organisations within the hospitality industry, tourism, local trade and food businesses, environmental organisations and government departments. The consultation was not a public consultation but limited to a target audience.

The consultation stated that the gull study aims were to manage impacts by taking account of the need for conservation and protection of wildlife alongside the town's human population, businesses, wider community and valuable tourism industry.

The consultation comprised of a questionnaire posing a total of 24 statements to which respondents were asked to indicate their level of agreement, based on five possible responses of strongly agree, agree, neutral, disagree or strongly disagree. An opportunity for further comment was also provided.

The questionnaire included statements on topics ranging from attitudes towards whether as wild animals gulls could or should be managed, the possible impact they were deemed to have or not visually in nesting or physically interacting with humans. Further statements also explored respondents' attitudes towards the sufficiency of existing measures, current signage, education and whether public spending should be undertaken or not.

2.3. A review of the gull grant proofing scheme

In 2019 Scarborough Borough Council (SBC) introduced a gull proofing grant scheme which match funded, that is, contributed up to 50% of proofing costs with a limit of £2,000 towards the costs of gull proofing any private building in defined areas of Filey, Scarborough and Whitby.

The grant scheme was initially only available to a focussed geographical area but was later extended to be available to the whole of the borough. The scheme was concluded in January 2025.

Proofing of buildings is a non-lethal control measure widely available and used in the UK in attempts to deter gulls from nesting and includes the use of deterrent methods, such as netting, the

use of wires, spikes, fire gel and electric shock wiring (Avi-Shock) and are described in detail in *Appendix D*.

Installation of these measures can be commissioned by pest control specialists, such as NBC Environment and Bird X. While specialist providers and installers of proofing measures will claim proofing measures can be successful in practice there is no wider empirical evidence to support or fully evaluate their effectiveness. Evidence does exist that netting and the use of spikes can have undesirable consequences in entrapping live birds or impaling (especially chicks), resulting in fatalities or expensive and timely rescues by organisations such as the Blyth Wildlife Rescue, the RSPCA and others. (Turner, D.M. 2018, September 23).

To inform this study a physical review of premises which have received grants during the scheme's existence was visited by an Environmental Protection Technical Officer, supported by Matthew Stone (Freelance Ornithologist) during May 2025.

For each site an assessment was made to determine whether the original deterrent method was still installed, and if so to assess its condition and apparent effectiveness, that is, to assess whether there was any deterioration in the deterrent installed, for example, in netting and whether there was any evidence of breeding gulls present. A summary of the findings for each deterrent method is provided below. The results of these visits are discussed in the Results section 3.3 However, given the implementation of the Environment Act 2021, this scheme could not be continued in its current format. This is because the gull proofing scheme was not based on a risk assessment or similar risk-based objectives and did not fully balance the impact on the nesting birds and the public health concerns.

2.4. A report for Scarborough Borough Council: Urban Gull Monitoring: 2018 to 2019.

Between 2017 and 2019 the former Scarborough Borough Council (SBC) commissioned NBC Environment to conduct a programme of Herring Gull dispersal and disruption activity. The programme included removing Herring gull nests and eggs from the towns of Scarborough and Whitby in each of the breeding seasons of 2017, 2018 and 2019, with removals also taking place in Filey during 2017 and 2018 (removals were not undertaken in Filey during 2019 due to the low incidence or reported gull issues).

The programmes' objective was to reduce the number of Herring gull in the towns and to reduce the abundance of Herring gulls in high footfall areas, such as the town centre, harbour and foreshore areas.

Following liaison with the RSPB and other interested stakeholders, SBC commissioned an ornithologist from the Institute of Estuarine and Coastal Studies (IECS) to undertake an assessment of the town(s) population of Herring Gull (Larus argentatus), their distribution and the effectiveness of a managed 'dispersal and disruption program'. This study was initially conducted during 2018 in Scarborough town and extended to also include Whitby town in 2019. No monitoring was undertaken in the town of Filey due to removals having been stopped at the end of 2018.

2.5. A report for North Yorkshire Council: Black-legged Kittiwake Artificial Nesting Structure (ANS) feasibility study 2025

As part of this study a review was commissioned to understand whether man-made Artificial Nesting Structures (ANS) were a feasible way of attracting breeding populations of Kittiwake away from urban areas in Scarborough town. Specifically, the feasibility study was commissioned to assess:

- Whether there is a clear case for investing in ANS to provide Kittiwake nesting opportunities away from existing urban breeding locations, whilst supporting their populations but minimising their impact on urban areas.
- Determine whether there is a robust case for why investing in ANS would not be feasible.
- Consider and appraise alternative cost-effective options worthy of investing to mitigate the impact of Kittiwake in Scarborough town, highlighting the limitations and benefits of each option.
- ANS were introduced on the River Tyne in 1998 and more recently have been installed in the UK by the Off-shore Wind Farm (OWF) industry to deliver compensatory measures for the predicted impacts (collisions and mortality) of Kittiwake with OWF turbines. Due to these initiatives, there was a wealth of evidence, including the publication of a ANS design pattern book (Ørsted, 2021 and Ørsted, 2022) along with detailed monitoring requirements and modelling (Ørsted, 2023 and Ørsted, 2024) to inform the study, the results of which are discussed in 3.0 Results.

2.6. Bathing water quality

The aims and objectives of this study and subsequent strategy is to manage gull interaction with the public on land (including the beach). It is not intended to look at the wider relationship with gulls and bathing water.

Any impacts on bathing water by actions contained within this study have been assessed through the 'Environment Impact Assessment'.

3.0 Results

3.1. Results of the Urban Gull Study consultation (March 2025).

A total of 102 respondents completed and returned the Urban Gull study consultation questionnaire. Respondents were primarily from the hospitality (29%) and environmental sectors (27%), with further responses from government departments (15%), tourism (13%), charities (8%) and trade (5%) and food (3%) sectors.

In addition to stating which of the above sectors respondents were from, there was a total of 23 further questions or statements posed to respondents. The statements can be broadly categorised in respect of respondent's attitudes towards wider attitudes and experiences, waste management, cleaning, proofing measures, education and signage and attitudes towards the role of Local authority spending.

General attitudes and experiences of Gulls

More respondents than not believed gulls were wild animals and should not be interfered with (45% strongly agree/agree versus 41% disagree or strongly disagree), with the majority (63% strongly agree/agree) responding that gulls add character to coastal areas. However, more respondents (42% disagree/strongly disagree) with the statement that gulls would be likely to attract additional visitors than those who believed they would (28%).

A higher number of respondents (29% strongly agree) replied that gulls do not negatively impact the character of coastal areas versus a fewer number (12% strongly disagree) who thought they would. However, most respondents replied that they had had negative interactions with gulls (68% strongly agree/agree).

Waste management

Most respondents replied that waste food, such as discarded takeaway food, attracts gulls to stay in the town (96% strongly agree/agree), with a majority (84% strongly agree/agree) also replying that gulls being actively fed is an issue. Unsurprisingly most respondents (89% strongly agree/agree) also stated the need for more measures to protect waste and food sources from gulls, with waste bags opened by gulls being a significant issue (85% strongly agree/agree) and that more was required regarding the provision and frequency of waste collection.

Cleaning

Most respondents (68% strongly agree/agree) replied that gull droppings created visual or odour problems and that increased cleaning using jetting in town centres is required (74% strongly agree/agree).

Proofing measures

Respondents were fairly equally divided (43% strongly agree/agree versus 45% disagree/strongly disagree) on whether gulls nesting created a visual impact. Views were similarly divisive on whether there should be a greater use of netting on local buildings (43% strongly agree/agree versus 41% disagree/strongly disagree). However, there was a clearer consensus that gulls can be deterred from nesting on buildings (53% strongly agree/agree versus 22% disagree/strongly disagree) and that other proofing measures should be used as deterrent methods (55% strongly agree/agree versus 21% disagree/strongly disagree).

Education and signage

The majority (85% strongly agree/agree) of respondents believed that greater education could positively change individuals' attitudes and interactions with gulls, such as discouraging the active feeding of gulls. A further majority (75%) strongly agree/agree) that additional signage across the town, such as along promenades, in restaurants, and takeaways, could help minimize the food available to gulls.

The role of Local Authorities

The majority (65% strongly agree/agree) of respondents replied that local authorities should devote resources to managing urban gulls, and that the local authority should invest in and provide alternate nesting structures for gulls (specifically Kittiwake) to breed on as a way of managing their nesting location within the town (76% strongly agree/agree). Similarly, most (84% strongly agree/agree) respondents believed future building designs should consider seabird nesting implications.

Further comments

Many further comments (over 5,000 words) were provided by respondents at the end of the questionnaire. These comments are detailed and are available in *Appendix A*.

Many attitudes towards urban gulls and their management are relatively polarised, with respondents referring to gulls as 'part of seaside resorts', which 'we need to be able to live side by side with' or even in the case of Kittiwake, 'celebrated and their presence better explained'. By contrast others called for 'culling', the 'control of numbers', with issues of 'aggression' and even likened their presence to that of rats. Such comments suggest that there is a low awareness of gull species wider population decline, conservation status and legal protection.

3.2. Results of the Herring Gull managed disruption and dispersal scheme (2017-2019).

In 2017 - 2019 the former Scarborough Borough Council undertook a programme of managed disruption and dispersal removing Herring gull nests and eggs in Scarborough and Whitby towns. The removals were undertaken from buildings within the sea front and town centres, within bespoke geographic areas and were carried out under licence from Natural England by a specialist pest control contractor, NBC Environment.

The effectiveness of the scheme was evaluated by the Institute of Estuarine and Coastal Studies (IECS) at University of Hull, following a commissioned study by the former Scarborough Borough Council (Stone, J.M., 2019).

The study concluded that despite the number of nests and eggs removed (807 nests and 1,436 eggs in Scarborough town between 2017-2019 and 82 nests from Whitby town in 2019) the population of Herring gull remained relatively stable between 2018 and 2019.

In Scarborough town Herring gull eggs and nests were removed from areas of perceived high concentrations of nesting, which represented around 12% of the towns total geographical area. Within the target area many nests were not removed due to issues with access, illustrating the practical challenge of being able to undertake the targeted removals. The study also illustrated how widespread Herring gulls nested in the town, with nests recorded across most of the towns geographical area and 17km^2 surveyed, albeit in different densities.

Within the target areas for removal the results of daily transect surveys recording the presence of Herring gull along the main high street precinct in Scarborough town centre and the foreshore showed that Herring gull remained present in abundance.

In conclusion the study proved that the programme was not effectively meeting its objectives, and the programme was not continued. The conclusions were like those previously reached following other historic attempts to control gull numbers within the borough by lethal methods. In 1977 narcotic bait was used in Whitby and Scarborough, and in 1991 control was undertaken by removing nests and eggs, both were deemed to be ineffective (Ayrton, W.R., 2000).

N.B. Since 2019 when it was possible to apply for and seek approval from Natural England to control gull numbers using lethal methods under license on a relative wide scale there has been an update to Natural England's guidance and granting of licenses (Natural England, 2021a). Licenses are now much more restrictive, infrequently granted and where granted are typically only available on a small scale.

3.3. Results of the proofing grant scheme review

The proofing grant scheme supported a total of 65 applications (39 in Scarborough, 20 in Filey and six in Whitby) for proofing measures costing ~£143,000 of which ~£27,500 grant funding was made available. Where grants were made available the use of spikes was the most popular deterrent method (36 schemes) followed by Avi-Shock (26 schemes) and netting (nine schemes), with many schemes using a combination of proofing methods. No grants or applications were made for the use and application of fire gel deterrent.

Spiking

Predominantly spikes were installed on the apex joints of domestic roofs or on windowsills and ledges. For all sites where grants for spikes had been provided spikes were installed and in seemingly good condition. There was no evidence of spikes or 'sections' of spikes coming loose and in need of maintenance.

Overall, it was deemed that spikes were effective in deterring gulls from breeding on the sections of buildings where they had been installed. There were no instances of gulls breeding directly on top of spikes installed as part of the grant approved schemes.

However, it was evident that spikes have been installed on many other buildings, which were not part of the grant scheme, where the date of installation is not known. At a number of these premises there was evidence of Herring gull breeding on-top of spikes, mainly where spikes had been installed around or between chimneys. In addition, there was also evidence of Kittiwake sat on or among spikes where they had presumably previously bred.

Within Scarborough town there is evidence of birds being harmed by spikes and chicks dying following being impaled on them, based on *pers. comms* with local recorder Nick Addey.

Avi-Shock

Where grants were provided Avid-Shock was installed predominantly on the apex of roofs or in long strips on flat roof sections, along shop/takeaway overhanging shop fronts. For these takeaways and restaurants, particularly those with outdoor seating over which shop front roofs protrude and look over seating areas, the flat roofs are likely to provide good vantage points for Herring gull to stand and wait for feeding opportunities.

Where installed Avi-Shock appeared to be largely effective with no evidence of breeding birds on any area of track. In one location a Herring gull was stood on a section of Avi Shock track, where presumably the track was not live or turned on. At another location the Avi Shock system

appeared to be electrically shorting with intermittent electric cracks audible. For all other locations Avi Shock looked to be well installed and in good repair and was relatively discreet in appearance, only evident really if you were looking for it.

Netting

Netting installed as part of the grant scheme was installed in a variety of locations. These included on the façade of buildings, covering windows and ledges, on the roofs of buildings, covering refrigeration, ventilation or similar structures, or at the rear of buildings, covering windows, ledges, pipes and spanning open areas of connecting buildings.

Netting was largely well maintained and in good working condition. Where netting was installed on the façade of a building in one large section, anchored and tensioned the netting appeared both effective and in good condition. Similarly, where netting was installed on roofs and over boxed aluminium frame structures netting was taught and in good condition.
Where netting was installed at the rear of buildings and fitted in sections spanning open areas there was evidence of netting coming apart and of holes in netting of around one foot in diameter. Attempts to repair netting, for example, by closing gaps with cable ties looked to be inadequate with evidence of stretching and gaps appearing. It is possible that the examples of problematic netting were associated with sites where pigeons were present and potentially causing issues with the netting.

Evidence of gulls breeding on netting was limited and largely contained to the edges of areas where netting was installed and seemingly likely to be less taught or sagging and upon which the birds could weigh down the material.

Netting can pose a risk of entanglement or entrapment for birds and not just gulls. There is evidence of birds dying in such scenarios or being entangled alive. These occurrences can result in creating public alarm and on occasion lead to attempts to rescue birds by Wildlife Trusts, the RSPCA and sometimes involving the Fire Service.

Fire Gel

Whilst none of the premises visited received grant for the application of fire gel deterrent, this method of proofing has previously been used in Scarborough town and at scale on the Spa Bridge in 2022. The cost, efficacy and effectiveness of this programmed is discussed in more detail below.

Spa Bridge fire gel proofing effectiveness

In both 2021 and 2022 the Spa Bridge and it's supporting structures were home to around 270 Kittiwake AON (pairs). Following complaints from local businesses of guano falling onto the pavements and walkways below the Spa Bridge North Yorkshire Council commissioned the installation of 2,500 fire gel tubs at a cost of ~£30,000 to ~£50,000 by a specialist contractor. Given the significant size of this sub-colony population and both Kittiwakes conservation status and potential 'functional linkage' to the Flamborough and Filey Coast (FFC) Special Protection Area where the species is a protected designated feature (Natural England, 2018), it was necessary to undertake a Habitats Regulations Assessment (HRA). WSP was commissioned by North Yorkshire County Council (NYCC) to undertake the Habitats Regulations Assessment (HRA) screening and assess whether the proposals to exclude nesting kittiwake (the 'Proposed Exclusion') from Spa Bridge, Scarborough were likely to have a significant impact on the FFC population (WSP 2022).

Following the installation of fire gel on the Spa Bridge in 2023 the number of breeding Kittiwake was reduced to 189 AON in 2023 and 187 AON in 2024. This represents a ~30% reduction in breeding numbers from the previously recorded 270 AON in 2021 and 2022. The number of breeding pairs has since risen modestly in 2025 to 193 AON, according to the local recorder *pers. comms* Nick Addey.

It can therefore be concluded that fire gel is only at best partially effective with any impacts also being limited in duration, in keeping with the stated shelf life and effectiveness of 2-years (NBC Environment, 2025). Without re-application it is likely numbers of Kittiwake breeding on the Spa Bridge will rise from their current level.

Fire gel pots are exposed to the weather and are prone to becoming covered over with dirt, fouling or dislodged. Based on the evidence of installing them on the Spa Bridge in 2023 they can be the least effective method of deterrent.

Engagement and enforcement

Situations where the local authority can require landowners to proof their building against nesting, now must be balanced against the duties under the Environment Act 2021. Natural England has stated that it will only issue licenses for serious public health and safety reasons and not ordinary nuisance such as noise or swooping, (Natural England 2021b).

That said there will be a small number of situations where the gulls are nesting in such quantities, or the locations are such that the resultant guano poses a serious risk to public health and safety.

Such a situation will require the use of a public health and safety risk assessment tool and will be very much site specific. An example could be where Guano is building up in such quantities on step, slops or near a high pedestrian used pathway, that it poses a serious risk of injury due to slip, trip or fall.

Proving effectiveness conclusions

Deterrent methods can seemingly be effective, albeit are rarely 100% effective with some methods either requiring repeat application (fire-gel) or on-going maintenance (netting) to safeguard both their effectiveness and the welfare of birds.

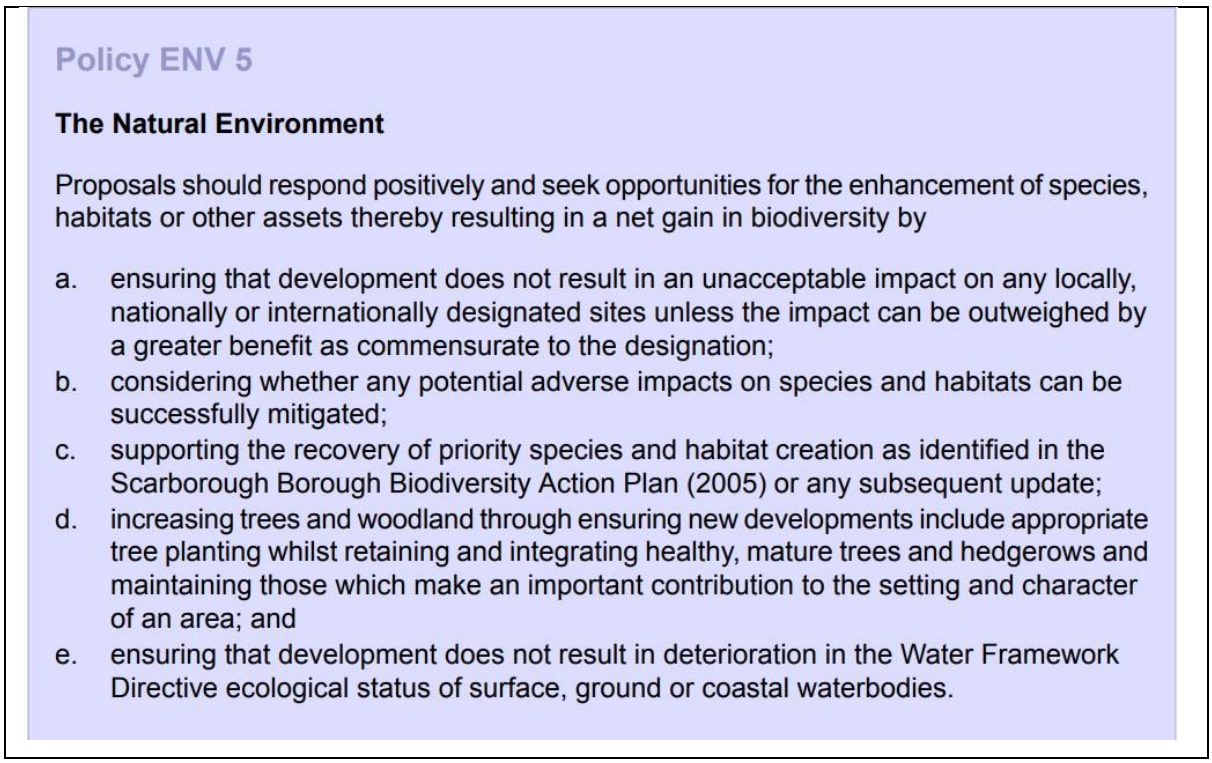
A limitation of both the grant scheme and general installation of deterrent measures is that no provision is made for either their on-going inspection or on-going maintenance. Netting which becomes loose or damaged can be considered to pose the highest risk to bird welfare and can also be unsightly.

Based on the evidence available, including both the walkover inspection carried out in May 2025; a review of other literature (notably evidence presented to Newcastle City Council, which highlights the animal welfare risks) and a combination of expert opinion, the effectiveness and suitability of individual proofing measures has been assessed and is summarised in Table 2.

3.4. Planning policy

Legacy Local Plan

Current planning policy and controls are subject to legacy district local plans. For coastal areas the local plan is detailed in Scarborough Borough Local Plan, 2011-32 (Scarborough Borough Council, 2017). Within this plan, Policy ENV 5, Figure 8 , states that the Local Planning Authority will respond favourably to proposals that aim to conserve or enhance biodiversity as a primary objective and proposals that incorporate biodiversity in and around developments, therefore, development proposals should demonstrate how they respond positively to those assets in the following paragraph and can result in a net gain to biodiversity.



Policy ENV 5

The Natural Environment

Proposals should respond positively and seek opportunities for the enhancement of species, habitats or other assets thereby resulting in a net gain in biodiversity by

a. ensuring that development does not result in an unacceptable impact on any locally, nationally or internationally designated sites unless the impact can be outweighed by a greater benefit as commensurate to the designation;
b. considering whether any potential adverse impacts on species and habitats can be successfully mitigated;
c. supporting the recovery of priority species and habitat creation as identified in the Scarborough Borough Biodiversity Action Plan (2005) or any subsequent update;
d. increasing trees and woodland through ensuring new developments include appropriate tree planting whilst retaining and integrating healthy, mature trees and hedgerows and maintaining those which make an important contribution to the setting and character of an area; and
e. ensuring that development does not result in deterioration in the Water Framework Directive ecological status of surface, ground or coastal waterbodies.

Figure 8: Policy ENV 5, The Natural Environment

Scarborough Borough Biodiversity Action (Legacy) Plan

In 2005 the former Scarborough Borough Council published a Biodiversity Action Plan, within which there were no direct actions relating to gull species. However, subsequently Local Nature Recovery Study plans have considered gull species.

Local Nature Recovery Strategy (LNRS)

NYC are currently in the process of developing a county wide Local Nature Recovery Strategy (LNRS). Formulating a strategy is a legal requirement for the local authority. It requires that the Council identifies priorities for local nature recovery including habitat and species of concern. NYC has identified coastal areas as one of its key priority areas for nature recovery. LNRS priority CST_P02 contains five measures (actions) with respect to seabirds (North Yorkshire Council LNRS, 2025) as detailed in Figure 9.

Priority:				
CST_P02	**Enhance habitats for seabirds**			
	Enhance habitats for seabirds on the North Yorkshire coast, both on our cliffs and in our urban spaces, to help resolve pressures from human activities and the impacts of climate change.			
Benefits from nature:	• Access to nature • Health and wellbeing • Educational resource	• Sense of place • Climate regulation • Animal welfare		
Focus species:	• Sea birds	• Adder		
Measures (Actions):				
CST_M02.1	Conduct regular population and productivity monitoring of seabirds nesting in urban spaces and on non-designated cliffs.		Enabling activity	Unmapped
CST_M02.2	Broaden recreational disturbance monitoring and management to incorporate key locations and activities outside of designated areas.		Enabling activity	Unmapped
CST_M02.3	Provide advice and support to communities in coastal urban spaces to encourage connectivity with nesting seabirds, utilise legal deterrents safely, and reduce access to litter and human food products.		Enabling activity	Unmapped
CST_M02.4	Work with local authorities and businesses to identify suitable nesting locations (or exploring the effectiveness of artificial habitat, such as towers) and raising awareness of their plight with the local community.		Enabling activity	Unmapped
CST_M02.5	Monitor and protect sea bird colonies on the North Yorkshire Coast from the effects of development and disturbance.		Direct action	Unmapped

Figure 9: Local Nature Recovery Strategy, Priority CST_P02 Enhance habitats for seabirds

The enhancement of habitats in urban and rural areas for seabirds is included. Urban related enhancements should be delivered through engaging with the relevant planning policy and development management process.

3.5. Results of the Kittiwake Artificial Nesting Structure (ANS) feasibility study

The introduction of a man-made Artificial Nesting Structure (ANS) for breeding Kittiwake has been considered by NYC as a way of managing the location of nesting Kittiwake in Scarborough Town. The results of the commissioned feasibility study concluded the introduction of an ANS in Scarborough Town, if located on the Grand Hotel Terrace, can be considered a feasible way of managing and influencing Kittiwakes nesting location.

Criterion from the design pattern book and Offshore Wind Farm (OWF) literature was used to evaluate four potential ANS locations in Scarborough Town during a site visit, from which it was concluded that only one site, the Grand Hotel Terrace, was viable.

A key recommendation from the design pattern book is that to be successful ANS should be near existing nesting Kittiwake and near to and facing open water. Since a mature colony on an ANS is

likely to occupy between ~50% to ~60% of its capacity for breeding pairs any ANS design should be built with space for double the number of target pairs.

Measuring ~70m in length the Grand Hotel Terrace has a maximum ANS design capacity for 1,050 nesting spaces. However, a more modest ANS design of ~30m in length could accommodate ~200 breeding pairs (comparable to the number of breeding pairs on the North side of the Grand Hotel in 2024), whilst providing opportunity for future expansion Figure 10.

Scarborough town is the only town in the county to have breeding Kittiwake present, with the most recent five-year mean (2020-20204) population estimate of 950 AON (pairs). In addition, there are an estimated 1,338 AON (pairs) on the Castle Headland (JNCC 2025 and J.M Stone., 2025). Within Scarborough town the Grand Hotel has the largest sub-colony of Kittiwake with a reported 663 AON in 2024. Based on *pers. comms* with Nick Addey, the local recorder, it is understood that the total of 663 AON includes several nests on an adjacent wall and that the precise number of AON on the Grand Hotel in 2024 was 607 AON. This total can be further broken down to include totals for each of the hotel's four sides as follows: North side 237 AON, East side 196 AON, South side 73 AON and West side 101 AON.

A considered design of any ANS can be sympathetic to the local environment and be aesthetically pleasing as demonstrated by the design of the 'Fisherman's hut' ANS in Hartlepool built from locally sourced materials and English larch. Whilst the cost of ANS introduced by the OWF industry are substantial, running into several million pounds for their development and installation, there is the potential for much lower cost alternative solutions. Several lower cost solutions, including temporary structures have been used elsewhere and it would be feasible to incorporate and adopt the design principles documented by the OWF industry in a low-cost solution.
Whilst it can be concluded that ANS are a feasible way of moving breeding Kittiwake from one (undesired) location to another (desired), the colonisation of any installed ANS may take several years and is difficult to fully predict.

If ANS are introduced in addition to any existing nesting habitat features, that is, without those being removed or proofed, then it is likely that the local Kittiwake population would grow in number rather than move to a new location. Ideally, if the objective was to encourage re-location of nesting Kittiwake to an ANS structure this would be done over several years during which there is a phased removal or proofing of existing structures and during which there is constant review and monitoring.

If a strategy of co-existence is adopted, which includes greater education, messaging and communication then the installation of a well-designed ANS offers a very meaningfully way of delivering and articulating those objectives. In Newcastle Upon Tyne the success of nesting Kittiwake is celebrated rather than tolerated, an approach and mindset which itself determines their overall local strategy and communication (Turner, D.M., 2024 and Tyne Kittiwakes 2025).

The Kittiwake ANS feasibility study is now being taken to the next stage of development with architects from ALIGN appointed to develop technical designs for consideration, including their structural deliverability and cost. This second stage and report from ALIGN is due for completion in Autunm 2026.

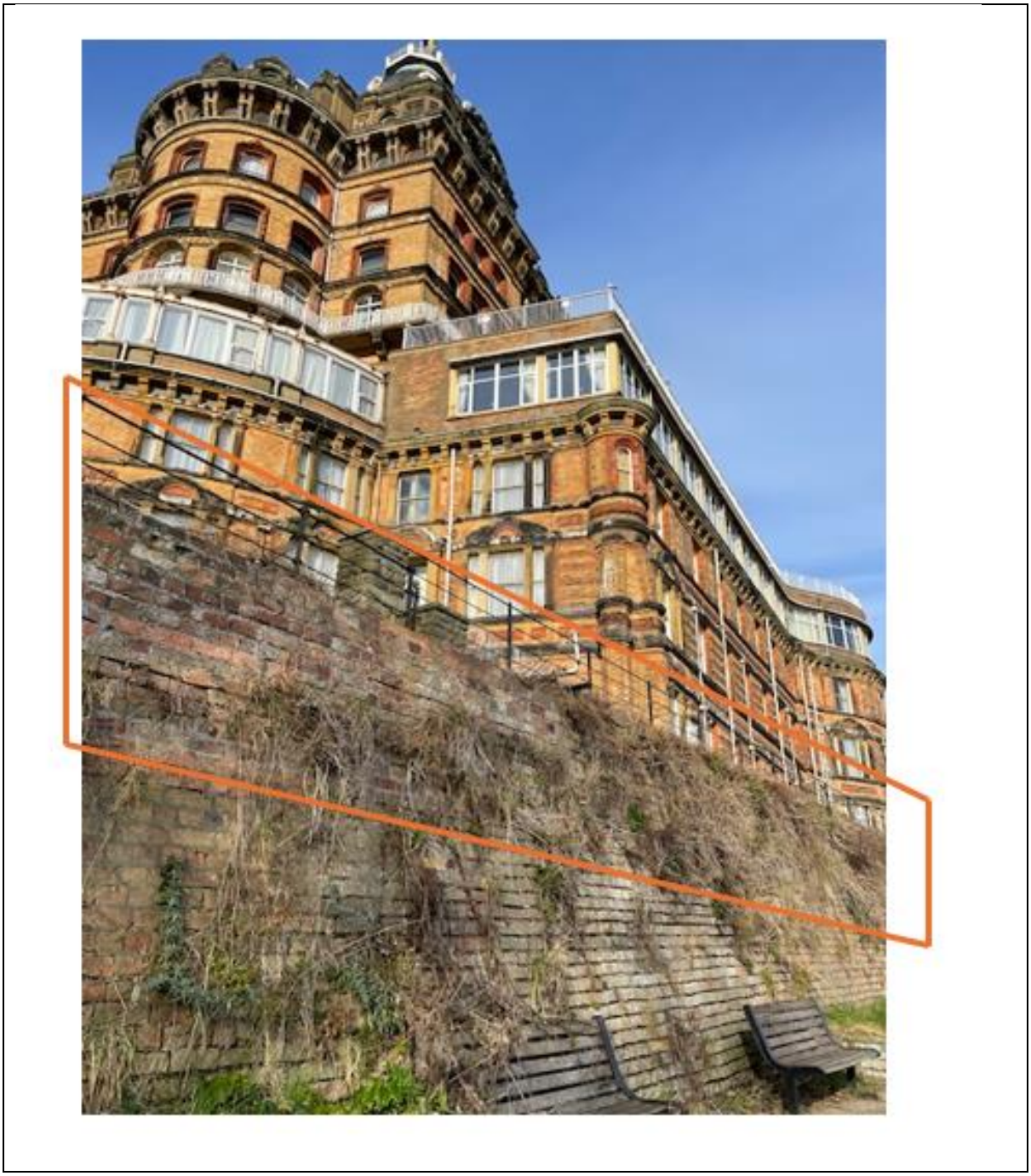


Figure 10: Illustrative space of potential nesting ledges / ANS on the Grand Hotel Terrace, Scarborough Town.

3.6 Bathing water quality

The aims and objectives of this study and subsequent strategy is to manage gull interaction with the public on land (including the beach). It is not intended to look at the wider relationship with gulls and bathing water quality. Any impacts on bathing water by actions related to this study and the strategy have been assessed through the 'Environment Impact Assessment'.

4.0 Proposed study recommendations

The aim of the recommendations of the study is to enable NYC to achieve its stated objectives, which are themselves in part a mandatory requirement for local authorities based on the Environment Act 2021 and of individual gulls' conservation status and legal protection as wild birds. The aims are:

- To promote and sustain a healthy population of all gull species.
- To provide and sustain a clean and safe place for residents of the coastal areas.
- To identify and implement suitable and sustainable measures to enable gulls and the public to successfully co-exist in the coastal areas.

To enable NYC to achieve these aims it is proposed that the strategy focusses on five core areas, or 'pillars' of management and delivery with further guidance on gull management also incorporated into Planning Policy. The five pillars are as follows:

1. Education and communication
2. Waste management services
3. Cleaning services
4. Proofing
5. On-going monitoring and evaluation

The recommendations of this study draw on prior knowledge, experience and consultation with key stakeholders. This process will need to be on-going, both evolving through trial and development but also on-going evaluation and monitoring, whilst also considering the Council's legal duties and financial implications.

These five pillars are discussed below, including where not previously presented, for example, cleaning services and background information related to the current level of service or activity undertaken.

4.1. Education and Communication

It is apparent from the consultation responses that knowledge of gulls, their conservation status and legal protection is limited. Similarly, there is likely to be a low understanding of Council's objectives, as evidenced by the number of requests to manage gull populations through lethal control versus promoting and sustaining a healthy gull population. Therefore, at the heart of the NYC strategy is the need for education and communication of NYC's objectives coupled with a need for a greater understanding of gulls as wild birds. This is premised on the knowledge that changing human behaviour is practically the only way to influence gull's behaviour and limiting any unwanted interactions. As a result a communications plan has been developed the scope of which is summarised below and detailed in full in *Appendix B* . In addition a separate Communications Plan document has also been produced.

NYC Urban Gull Strategy Communications Plan

The communications plan has several objectives, including raising the awareness of this study and the subsequent strategy, educating residents, businesses and tourists and seeking to change public behaviour in an open and transparent manner.

The plan seeks to consider both internal and external audiences and to do so in a consistent and community focused manner, using an informative 'everyday tone' in a positive way. To do this the plan will use a combination of traditional media and digital channels.

The key messages of the communications plan will include the fact that gulls are an intrinsic part of British seaside life. However, the issues they are causing can be serious and are recognised. Therefore, it is important to work collaboratively, innovatively and in a balanced way to ensure that our seaside towns continue to be safe and welcoming places.

Signage

Another element of communication is physical signage. The current signage in the coastal towns, installed between 2017- 2022, includes messaging that would no longer be deemed appropriate or consistent with this study and the communication plan. Historic signage focusses on solely negative aspects of gulls, or human-gull interactions, for example, "stop attacks never feed the gulls". This signage portrays the gulls as the villain, when they are being taught the behaviour by having the food provided by members of the public. New signage will be clear that gulls should not be fed by say simply "*please don't feed the gulls"*. Some examples of messaging and signs used previously and elsewhere in the UK which are

considered inappropriate are shown in Figure 11, where for example, messaging focuses on negative aspects such as attacks. Whereas examples of more neutral and desirable messaging are shown in Figure 12. If well designed these messages can be delivered in artwork that is sympathetic to the town, its tourism destination and need not detract from the enjoyment of a day out.

Figure 11: Examples of signage with messaging and images focussed on attacks

Figure 12: Examples of signage with a clear message and unbiassed representation of gulls

4.2. Waste management and litter provision

Background

The street cleansing service along the coast is very different due to service demand, compared to the rest of the County. The street cleansing function along the Coast accounts for just under 40% of the spend for the whole of the Council, demonstrating the cost and commitment to providing a high-quality public realm.

As part of the harmonisation of waste collection across the County, it has been agreed to implement a three-bin system as the default (paper/card, glass/cans/plastic and rubbish). However, this solution will not be practical for all residents, along the coast 7,000 dwellings present their waste in Council issued sacks, due to space constraints. Prior to the roll out of the future collection model in the locality, work is ongoing to reduce the number of sack-based collections. However, this is unlikely to radically change the number of residents who present their waste in this way.

While most of the housing stock in the area does have room for individual bins, the area does have, compared to the rest of the county, a disproportionate number of homes receiving a communal waste collection or a sack-based service. Both can provide challenges for residents and opportunity for vermin and gull access to waste prior to collection. Most of these locations are concentrated in the scenic former fishing villages along the coast and then the town centres of Scarborough, Whitby and Filey.

Waste presented in sacks is susceptible to attack by gulls which can be compounded by waste being presented in an ad hoc manner rather than at agreed times. This can result in waste being presented when it is produced at odds to the optimal time for collection, which again increases the likelihood of attack and the resultant deterioration in the street scene from spilt domestic or commercial waste Figure 13.

Several initiatives have been trialled in the past, notably gull resistant re-usable hessian sacks, which are used to contain bags of rubbish and deter attacks. The Waste Operations and Stret Scene service has also trialled litter bins with increased apertures so residents can dispose of waste when they produce it, which may be at odds with their collection cycle. Both options have had some success; the sacks do make it harder for gulls to access the waste but are prone to loss at large collection points. Often there is no safe and secure place for the gull proof sack to be returned to, which can result in windblown sacks being lost and contributing to litter issues. The larger bins can provide an effective solution but are

vulnerable to illegal disposal of commercial waste and can attract dumping of other waste streams. The cost of providing the gull proof sacks and litter bins were funded by the former Scarborough Borough Council as a corporate initiative. The Waste Operations and Street Scene service does not have a budget for a single intensive programme of reissuing or the ongoing replacement of gull resistant sacks. To reissue to all sack-based customers along with communication would cost in the order of £30k and the lifespan is in the order of 18-24 months. Alongside challenges presented from routine domestic waste is that posed by illegal dumping of waste by commercial premises and short-term accommodation. This is primarily down to attempts to avoid the proper cost of waste disposal and the challenges posed by 'changeover days' in holiday accommodation being different to waste collection days.

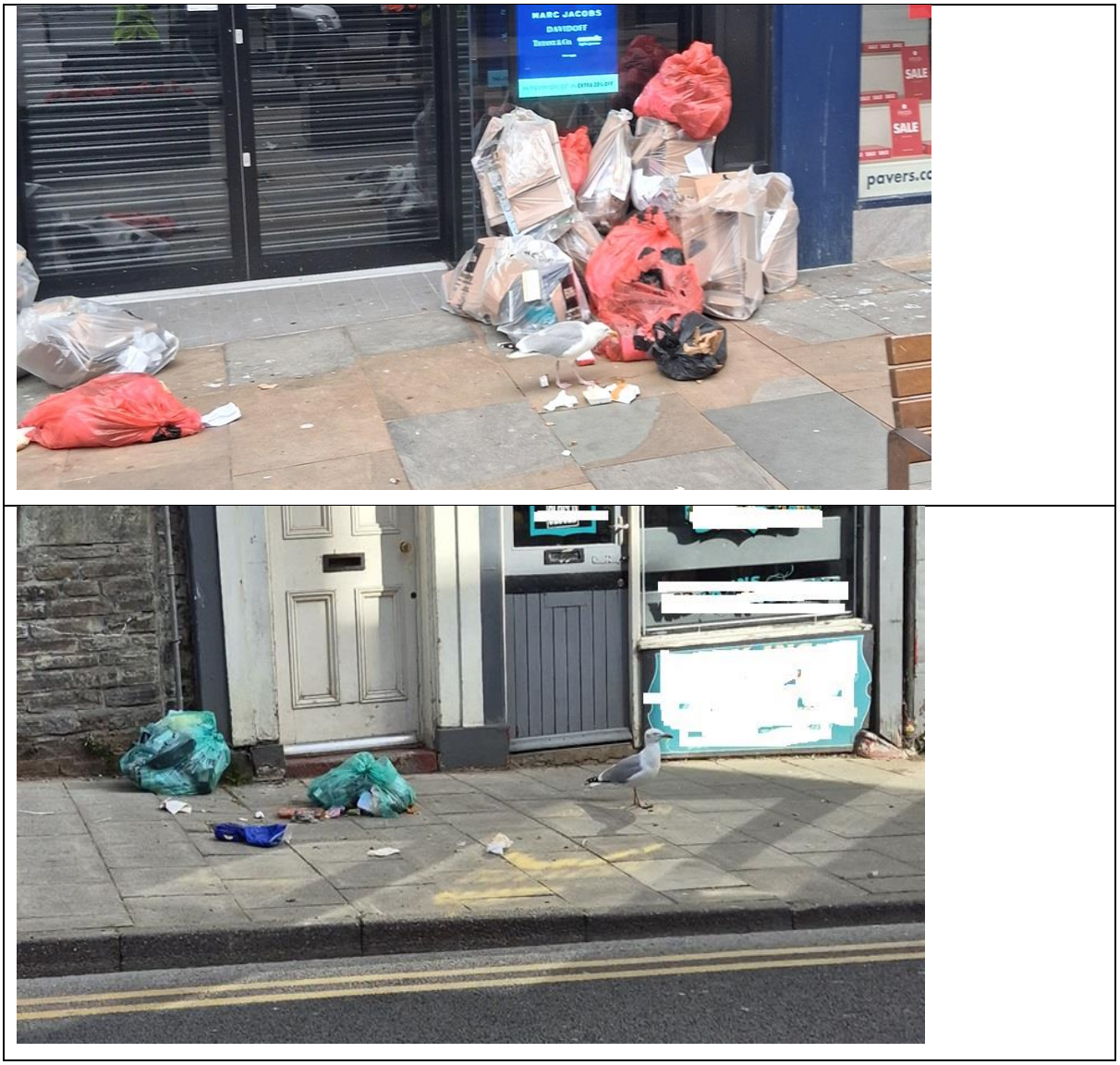


Figure 13: Herring gulls exploiting potential food resources from refuse sacks in Scarborough town, left out by occupants of adjacent premises.

Delivery / Resource Requirements

The areas most susceptible to gull attacks need to be monitored to assess compliance with the current collection methodology and legislation. The results of this monitoring activity will inform further action such as education and enforcement as well as a potential change to collection methods. The Environmental Enforcement team would carry out this monitoring support by the Environmental Protection and Waste Operations and Street Scene services. .

Engagement and Enforcement

Domestic premises

Local authorities have a duty to collect domestic waste by virtue of section 45 of the Environmental Protection Act 1990. By virtue of section 46 they can prescribe the type and number of receptacles which should be used for collection and how that waste should be presented for collection. However, the priority is to support residents and businesses to better manage their waste. By monitoring the areas most susceptible the Environmental Enforcement team can pro-actively tackle waste producers and encourage behavioural change. This will likely not always be possible and then escalation to formal enforcement, in line with policy, will take place. This will be an ongoing work due to the occupancy turnover and seasonal variations.

Commercial Premises

All producers of waste have a legal duty to ensure that any waste that is produced, stored, processed or disposed, is managed appropriately, kept under control and only passed to an authorised person or operator licensed by the Environment Agency to collect waste. This is called waste ‘duty of care’ and is contained within section 34 of the Environmental Protection Act 1990.

Further provisions are available to the Council under section 47 of the Environmental Protection Act 1990 to serve a notice where commercial waste is not being stored (which includes stored on the highway) in a way which is likely to cause nuisance or be detrimental to the amenities of the locality, requiring the provision of receptacles for the storage of such waste of a kind and number specified. The same notice can also provide for the steps to be taken to facilitating the emptying of the receptacles to prevent a nuisance.

For this purpose, a waste producer must use appropriate receptacles, secure and safely containing the waste and must obtain waste transfer notes from any person or operator duly authorised to accept the waste. This means that the waste producer must ensure that they

use the most appropriate waste receptacle which can prevent gulls from breaking into the waste.

In areas where euro wheelie bins are in use, the most effective way for the site operator to ensure no access is provided, is to keep the lid closed and preferably locked. Where a site operator is using commercial bags, there is the opportunity for gulls to break into the bags prior to collection. As such the site operator must ensure they have undertaken appropriate measures to secure the bags, and the most obvious method is to use gull proof sacks. Where commercial premises are in those streets which are hotspots for gull damage to waste sacks, the initial engagement should take place in the form of letters. These letters should advise site operators of their duties under section 34 of the Environment Protection Act 1990 in terms of duty of care to secure waste and should also explain the need to use gull proof sacks or another method to prevent entry to gulls.

Follow up visits must then be undertaken to assess if commercial premises are storing waste on the land or the highway which is causing a nuisance or being detrimental to the amenities of the locality. The use of Section 47 'waste receptacle notices' will be employed. Failure to comply with a Section 47 notice is an offence for which a fixed penalty can be applied. A graduated approach to enforcement must be followed in accordance with the Enforcement Concordat/Regulators Code and the Council's Enforcement Policy.

Litter bin provision

Litter bin provision along the coast varies between traditional permanent bins of 80 litres up to temporary seasonal containers that can accommodate 1,280 litres of waste. The frequency of collections also varies, the high footfall areas are emptied on continual cycle between 8am and 9pm, however at peak times the volume of waste presented can exceed the service capacity. This can be especially pronounced on warm light evenings as the beaches and commercial premises remain busy late into the evening.

The Waste Operations and Street Scene service has trialled several compacting litter bins for high footfall areas, which condense litter and so provide greater capacity on a smaller footprint. However, these bins are significantly more expensive and require significant numbers to enable any operational saving to be realised. The prevalence of fish and chip boxes along the coast, often means bins become full very quickly whilst still only containing a small amount of waste by weight. There is potential for greater partnership working with high volume producers of this material, which could ultimately require street litter control

enforcement, to ensure their contribution to street litter is adequately captured and addressed.

A review/audit of the current litter bins in use in high-risk areas of Herring Gull activity will be undertaken to determine if the existing litter bin estate is sufficient at preventing access to gulls. Design modifications or changes to existing litters bins with the retrofitting of devices or surfaces may be an option which will be investigated. This may prove easier and more efficient to roll out than the replacement of existing litter bins. An alternative design of a litter bin has also been identified which is designed to prevent gulls landing on the bin. The highest risk areas would be identified for upgrading of litter bins to gull proof/gull access prevention designs.

4.3. Cleaning: the control of gull guano

Background

Over the past five years an increase in focus on the removal of gull guano has taken place. This has primarily been focused on Scarborough town and isolated locations along the foreshore. The Council as a relevant highway authority has a duty by virtue of section 89 of the Environmental Protection Act 1990, to ensure each road or highway is, so far as is practicable, kept clean. However, this primarily concerns litter and detritus, rather than staining and odour which is the primary source of concern from the guano. NYC staff and outside contractors have undertaken a cyclical cleaning programme during the nesting season. In times of dry weather, the demand on the service can outstrip the ability to respond. It is also important to note the cost of this cleaning is approximately £50,000 annually for Scarborough alone.

Highway and Council owned land

In 2006 the department for Environment, Food and Rural Affairs produced a “Code of practice on litter and refuse” which includes descriptors for cleaning standards rated as A to D and frequency of expected cleaning. Although the guidance is titled ‘litter and refuse’, it does also include detritus which amongst other things is defined as “*which comprises small, broken-down particles of synthetic and natural materials, arrive at the site through the same displacement effects associated with mechanical, human, animal and natural actions…”.* Gull guano can be included in this definition. Although gull nesting occurs throughout each of the coastal towns, Scarborough has the greatest number of hot spots. Consequently, the Council undertakes seasonal guano jetting between May and August. A series of identified hotspots are regularly cleaned, including several hotspots which have been identified

following complaints and those identified by cleansing teams with local knowledge. Some hotspots are cleaned up to twice a day. The specific hotspots in Scarborough are listed in *Appendix C* .

Guano jetting processes involves the application of RM750 detergent, an intensive deep cleaner and then the use of a high-pressure jetting machine. Each site takes approximately 20 minutes to clean depending on the guano extent and surface type. An example of a hot spot area where Kittiwake guano is abundant is shown in Figure 14, with the area being cleaned using jetting shown in Figure 15. The hotspot sites are located directly below nesting gulls, which are predominately Kittiwakes, given their colonial nesting preference, which for most sites are below privately owned property. A notifiable exception to this is the Spa Bridge and Town Hall which are both owned by the Council.

Figure 14: A 'hot spot' area of pavement prior to jetting in Scarborough town 2025.

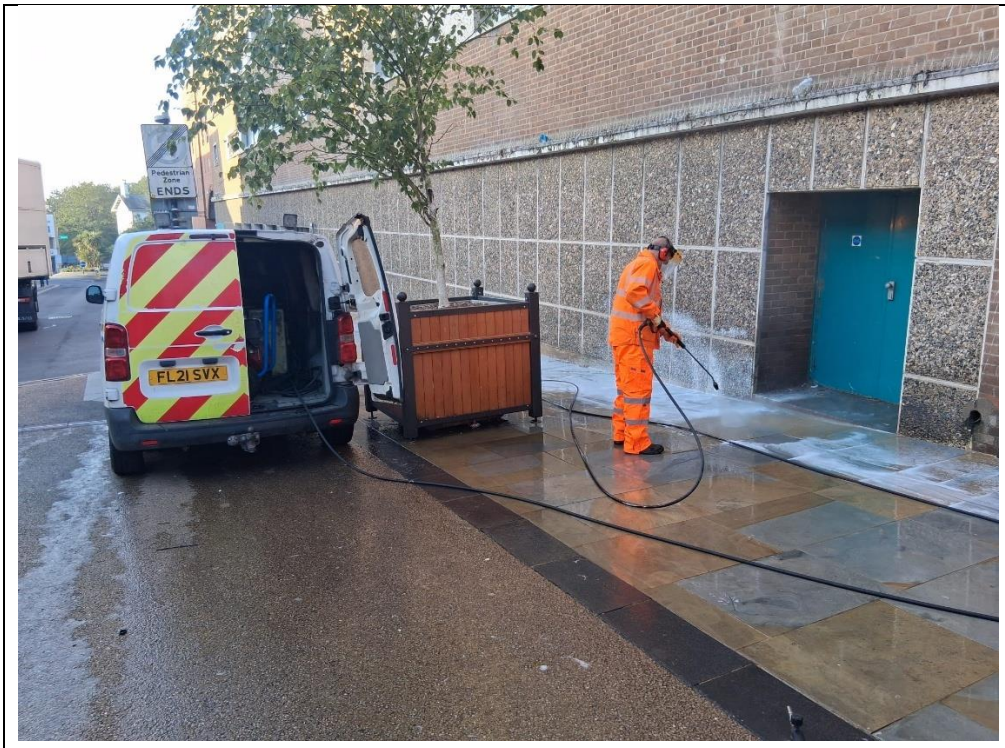


Figure 15: Jett cleaning in operation, Scarborough town 2025.

Private Landowners

Private landowners are responsible for maintaining their land. For this purpose, they have a general duty by virtue of the Occupier Liability Act 1984, to prevent suffering or injury to any person entering their land. Under sections 79 and 80 of the Environmental Protection Act1990 the Council has a duty to investigate matters which are deemed a nuisance or prejudicial to health (The Environment Act, 2021). This can extend to investigating nuisance due to accumulations of guano on private land or where there is gull nesting on the properties which is causing guano to build up on the highway. In such cases a statutory abatement notice must be served. Costs for any works carried out in default by the Council can be recovered from the landowner.

Powers also exist under the Anti-Social Behaviour, Crime and Policing Act 2014 (UK Government, Legislation, 2014) which empowers a local authority to serve a Community Protection Notice (CPN) where land or articles are such that they are having a detrimental effect or a persistent or continuing nature on the quality of life of those in the locality. Costs for any works carried out in default by the Council can be recovered from the landowner.

Lessons from Lowestoft

Lowestoft town has a relatively large population of breeding Kittiwake and consequently has faced similar challenges to those posed in Scarborough town. There are ~1,000 pairs of Kittiwake currently nesting in Lowestoft, with 997 AON recorded in 2024, *pers*. *comms* Amy Duran (Kittiwake Project Officer, East Suffolk Council). Nesting Kittiwake in Lowestoft have been at the heart of local controversy between local businesses and conservationists, including the RSPB and widely reported in local media. Proofing on the BT building prevented Kittiwake nesting on an established breeding location, leading to local pressure to provide alternative suitable nesting in the form of shelves fitted to the building.

In part to address this issue and following the role of the offshore wind industry in installing ANS at Lowestoft harbour and nearshore with ANS towers, Lowestoft Town Council have revised their approach to gull management. As part of a Partnership Agreement, Councillor Pearce has stated (Pearce, 2022) that Lowestoft Town Council aims to operate by:

- *Setting an example through co-operation with the Partnership, the Marina Theatre Trust, commercial tenants, heritage and schools, and other key stakeholders to manage and develop its own assets in accordance with the key aims and objectives of the Partnership.*
- *Recognising that kittiwakes and other wildlife are part of our natural heritage and integrating the promotion of natural heritage into the Town Council's wider Lowestoft heritage programmes.*

To further support the Lowestoft Kittiwake Partnership, East Suffolk Council also appointed a full time Kittiwake Project Officer in October 2024. The officer will be working closely with OWF developers who are reported to have pledged £50,000 a year for up to five years to help support the Lowestoft Kittiwake Partnership to work with local people and businesses in the town to enable Kittiwakes to nest safely in suitable locations while minimising the impact of the mess the birds make where they nest (Suffolk Wildlife Trust, 2022). The funding pledged by OWF developers is in addition to a spending commitment by East Suffolk Council in funding a permanent Kittiwake Project Officer but also plans to continue spending c.£30,000 a year on cleaning of pavements during the breeding season (*pers. comms* Amy Duran). Since commencing a programme of daily cleaning, there has been an estimated 80% reduction in complaints from local businesses regarding Kittiwake fouling.

Proposal

It is proposed that the current level of cleaning is maintained in full, including both the level of coverage, that is, the number of hot spots and the frequency of cleaning, which for some hot spots can be up to two times per day. Whilst the current level of cleaning and service is

over and above the recommended minimum cleaning maintenance detailed in the Code of Practice, the rationale for maintaining it is based on two core objectives as follows:

- The existing cleaning regime is required to maintain or improve the visual amenity of the towns and to meet the ongoing number of service requests received from the public.
- By maintaining the current cleaning regime, the risk of any degradation or staining of public highways that could pose a public health and safety risk will be mitigated

N.B. The Council's Waste Operations and Street Scene service currently funds the work (detailed below) however efforts should be made to recoup some of the costs from adjacent landowners whose properties (and gull nesting) is the predominant source of the gull guano causing/contributing to the detriment of the locality. Some of costs will be met through the service of appropriate enforcement notices and officer costs when works in default are carried out.

Delivery/Resource Requirements

A seasonal jetting programme is currently undertaken across c.25 sites, from May to September which are listed in *Appendix C* . This work is carried out by NYC staff and contractors. The current cost per clean is £15 per site per visit and the total cost per season is currently £50K. To facilitate engagement with the landowners, Regulatory Services (Environmental Protection Team) with the support of the Environmental Enforcement team will undertake the necessary engagement and enforcement.

Engagement and Enforcement

All identifiable premises which are immediately next to, behind or abut guano jetting hotspots should be identified. It is likely that these properties will be hosting nesting gulls. Initial engagement with landowners should advise the following:

- That the Council funds and undertake additional/seasonal cleaning.
- There is currently no requirement to carry out proofing measures.
- Request landowners to carry out their own cleaning/maintenance routines where gulls are nesting on their properties and it is a significant contributor to the guano on the highway.

Follow up visits would be undertaken to assess if the presence of gull nesting on the properties is contributing to guano build up on the highway and is likely to cause a nuisance or be detrimental to the quality of life of those in the locality. If so, the appropriate enforcement action could be taken, either the service of a Community Protection Warning

and then Notice (CPW/CPN) or a Statutory Abatement Notice. Either notice would need to be clear that the steps required relate to the cleaning and regular removal of the guano and not gull proofing. This is because the test of 'nuisance or amenity' is not likely to be compatible with the Councils' duties under the Environment Act 2021 (see section 4 below in terms of public health and safety). A public health risk assessment (aligned with Natural England's licensing criteria) for action on gulls would be carried out. Failure to comply with either notice is an offence for which a fixed penalty can be applied or in the case of the abatement notice a prosecution. However, in the first instance the Council would seek to do the Works in Default (WID) and in the case of a CPN, WID can be repeated. A graduated approach to enforcement should followed in accordance with the Enforcement Concordat/Regulators Code of Practice and the Council's Enforcement Policy.

4.4. Proofing measures

Conclusion

It is evident from the results of the proofing grant review that proofing can be effective, but the degree and longevity of any effectiveness varies by proofing method, as summarised in Table 2. The selection of a chosen proofing method is also influenced by the building type, construction and design meaning that individual proofing methods are not suitable for all locations, for example, it is not feasible to fix anchored netting to the façade of the Grand Hotel due to issues with anchoring into a listed building and the likely degradation of netting exposed to the elements as it is a seafront location. Where netting was well installed it appeared to be effective and as did the use of Avi-shock on flat roof sections. Fire-gel could be deemed the least effective and least durable, whilst the use of spikes was a good solution in smaller or more irregular areas, for example, on top of downfall pipe sections.

However, it is also evident that netting and spikes can both pose an animal welfare risk in the form of unintentional entrapment in loose or damaged netting and on occasion the impalement of young birds on sharp plastic spikes (Turner, D.M., 2018). These conclusions re-enforce the need for proofing to be installed by experienced specialists. In addition, there is a clear need to not just regard the installation of proofing measures as a one-off cost, but to provide and plan for either repeat installation (fire gel) or to undertake regular inspection and maintenance (netting).

In 2025 the Council ceased to provide grants for proofing, in part due to the recognition that proofing whole areas is impractical and to a degree by proofing one building the displaced nesting birds are only likely to move to the next nearest other suitable location.

Proposal

Proofing measures will be subject to a public health risk assessment based on a specific set of criteria. The criteria will be based on Natural England's licensing criteria for action on Gulls (Natural England, 2021b). Action will only be taken where it has been determined that it is in the public interest to ensure that landowners take action to proof their buildings where gulls are nesting and there is a public health concern. Given the conclusion that proofing can be effective for individual locations it is recommended that the Council provides guidance to residents and businesses to assist them to install proofing as a mitigation for nesting gulls by:

- Signposting and encouraging the use of professional contractors.
- Sharing evidence of successful proofing and unsuccessful proofing to re-iterate the need for measures to be professionally installed.
- Highlighting the need to consider and provide for regular review and maintenance.
- Consider the risks to animal welfare of poorly installed and maintained netting.
- Statutory Notices would be served on the property owners if the public health test (aligned with Natural England's licensing criteria for action on gulls) is met and they would be required to carry out the proofing works.
- The Council carries out works in default of statutory notice and recharges are applied to property.

Table 2: Summary of deterrent methods, their effectiveness, risk and overall suitability

Deterrent method	Longevity	Maintenance required	Effectiveness	Visual impact	Risk	Overall suitability
Spiking	Medium	Low	High	Medium	Chick mortality	**Fair**
Netting	Medium	Medium	High	Medium	Adult / chick mortality	**Fair**
Avi-Shock	High	Low	High	Low	Unidentified / limited	**Good**
Fire Gel	Low	Low	Low	Low	Unidentified / limited	**Poor**

4.5. Monitoring and Evaluation

Existing knowledge of seabird populations and distribution

Regular monitoring of urban gull population sizes and distribution is currently limited to the annual counting of nesting pairs of Kittiwake in Scarborough town by volunteers (Nick Addey) from Scarborough Bird Club. Data from these surveys is shared with NYC and made publicly accessible following submission of the data to the British Trust for Ornithology (BTO) national database and Seabird Monitoring Programme (SMP), the results of which are available on-line.

There is no regular monitoring established of urban Herring gulls, albeit estimates of urban gulls have been made in the latest national census Seabirds Count (2015-2021). Fortunately, there has been several studies commissioned which have assessed Herring gull population sizes and distribution in recent years (Stone J M., 2019). However, these are ad hoc and have not covered all the coastal towns in the County.

Proposed future seabird monitoring

It is recommended that the following monitoring is undertaken or supported:

Kittiwake breeding survey (annual)

Detailed surveys are currently undertaken voluntarily and the key data from them made available. It is recommended that NYC seek to support volunteers in their efforts and liaise with the YCUGP on how best to do that, for example, by potentially contributing towards funds for the Scarborough bird club.

Herring breeding survey (5-yearly)

The monitoring of Herring gulls is more challenging than Kittiwake due to their much wider distribution and tendency to nest individually rather than in colonies. As a result, the effort to survey them is greater requiring more time and resource. It is therefore recommended that Herring gulls are surveyed using a repeat of the methods undertaken to assess their abundance and distribution in the 2018 and 2019 study (Stone J M., 2019). This is likely to require one to two individuals for two weeks.

Herring gull ‘hot spot’ (town centre and foreshore) abundance

It is suggested that by understanding changes in the number of Herring gull within the busiest parts area, the Council will be able to assess the impact of other measures implemented as part of this study and subsequent Strategy and Action Plan..

This would require simple transect surveys to be undertaken following the methodology used in the 2018 and 2019 study (Stone J M., 2019), that is, requiring an individual to count during the summer months the number of birds in defined areas/sections for example the town centre and foreshore in Scarborough, two to three times a week, with each count taking approximately 1 hour.

Proposed monitoring of the implemented measures

Evaluating management measures

It is anticipated that as part of the study that there will be changes regarding the use of proofing (netting, spikes and fire gel deterrents) and changes to waste management. To evaluate the effectiveness of these changes relevant monitoring should be undertaken to gather the evidence required as part of their on-going evaluation. For example, if proofing is installed on individual buildings, it is proposed that an annual visit during the breeding season is undertaken to assess whether the measure has been successful to assess whether there are any nests being built or active and the number and species of each if there are new nests.

On-going consultation – assessing changes in attitudes

Given that current attitudes towards urban gulls vary considerably it would be desirable to understand how these attitudes may vary over time. This is particularly relevant since the study is proposing changing the messaging and communication regarding gulls to be focussed on co-existence. Whilst it is envisaged that not everyone's attitude will or can be changed, it will be of value to understand how attitudes are changing, if at all, and how effective any new messaging or communication is. To understand potential attitudinal changes, it is proposed that a programme of market research be developed to monitor, town residents, businesses and visitors' attitudes.

Academic research

There exist several academic institutions who are currently researching animal behaviour, attitudes and urban development, in particular the Universities of Hull, Exeter and Newcastle. These academic institutions and researchers have the potential to help the Council gain greater insight and understanding on a wide variety of research topics.
It is therefore proposed that the Council actively engages with academic institutions to share the Urban Gull study and subsequent Strategy and seek potential research opportunities. Research may be conducted by undergraduate or postgraduate students at relatively low cost or free or potentially could be commissioned for individual projects.

Table 3: Summary of proposed monitoring, frequency, cost and complexity

What	When	Who	Resource	Complexity
Breeding Kittiwake survey	Annual	Volunteer	Support	Low
Breeding Herring gull survey	5-Year	Commission	£8,000 est.	Medium
Herring gull count (town centre / foreshore only)	Annual	Commission	£3,000 est.	Low
Management measures effectiveness Proofing Communication	Annual	Commission	(internal TBC)	Low
Survey people's attitudes Residents Businesses Tourists	Annual	Commission	(internal TBC)	Low
Academic research Productivity Behavioural	On-going	Academic	Support 50/50	Low

4.6. Planning Policy and Control

Local Plan

The Council is currently developing its Local Plan. This study and subsequent strategy will feed into that new Local Plan by supporting and sponsoring policies which specifically address the following matters:

- New developments which should design in features to prevent nesting by gulls.
- New development which should provide active or passive provision for gull nesting.
- Locality development works to identify areas or districts to which these policies are applicable through the development of mapping.

Building design

The Council will seek to provide clear guidance on design criteria to developers concerning provision of gull ANS on new buildings and where it is appropriate to do so features which prevent an attraction to gulls.

5.0 Financial considerations

5.1. Budgetary requirements

Gull Proof Sacks

The exact number of gull proof sacks which will likely be required is currently unknown, as this data is still being collected. However, the current estimate is for an initial delivery of 5,000 units at a cost of £13,300. This will provide for an initial roll out to all domestic premises on sacks and commercial premises which currently pay for a waste contract with NYC (includes holiday lets but excludes commercial premises which use third party waste contractors). This covers an initial period of 18-24 months. Additional costs for hooks to hang the sacks will be required and although currently unbudgeted is likely to be a low. It is anticipated that over the 18-24 months of this roll out, some sacks will need replacing due to damage or loss. Hooks will likely require replacement periodically.

Education Campaign

A standalone communications campaign has been developed with the support of the Council's Communications team.

Seasonal Guano Jetting Hotspots

The Council will continue to carry out seasonable guano jetting hotspots where it is deemed appropriate and necessary. A review of sites will be undertaken, and further work will be

undertaken to determine whether alternative guano controls can be implemented or actioned. Seasonal costs are £50K. The current service level is only deliverable with the use of a contractor to supplement the Council's resources during the summer months.

Gull proofing measures on private land/buildings

The Council will engage with landowners and agents where gulls are nesting, and which pose a serious public health and safety risk. Appropriate action will be taken based on a public health risk assessment. Proofing will only be used to protect the public from the most serious risk to health. Statutory Notices or Community Protection Notices could be served on the property owners if the public health test is met and they would be required to carry out the proofing works. The Council can carry out Works in Default and re-charges can be applied to the property, however, such re-charges often take a long time to recover, meaning the Council could potentially be carrying a large debt for a significant period. However, given that each site would be subject to a 'high bar' public health risk assessment aligned with Natural England's licensing criteria for action on gulls, the number of sites likely to meet the criteria will be very low.

Proofing Grant Scheme Suspension

The previous proofing grant scheme introduced by the former Scarborough Borough Council ended in January 2025. The option of reintroducing a general proofing grant scheme is not recommended, as such a policy would not be compatible with the duties that is now imposed on the Council under the Environment Act 2021 (The Environment Act 2021 Regulations,2025). Landowners should instead be signposted to the information supplied by Natural England if they want to undertake any proofing or other works concerning gull protection measures on their property (Natural England 2021b).

Gull Proofing on council buildings/estates

The relevant building/asset owner/council department will be responsible for arranging any proofing work which would be subject to the same public health risk assessment. Maintenance of any such proofing works requires ongoing monitoring and repairs.

Audit and Upgrade of Gull Signage

The Council will undertake an audit of existing signage concerning gulls and will undertake a schedule of work to replace and upgrade them as appropriate. New messaging and designs will be used. The total costs of such a project are unknown but total replacement of signage installed previously in 2017 was £3,086, excluding installation costs with the total costs of

action currently unknown (audit of existing signs required). A provisional budget of £5000 is required.

Waste and litter enforcement

Domestic and commercial waste enforcement can be undertaken where there is evidence that waste has not been securely controlled or presented incorrectly for collection which in turn allows gulls to break into and access the waste. This will include serving of statutory notices and use of fixed penalty notices (FPNs). Street litter control notices can be used where specific premises are linked to litter sources. This is most likely to be hot food takeaways. This activity can be carried out by the Environmental Enforcement Team as part of its routine activities supported by the Environmental Protection Team. FPNs can partly fund enforcement activities and monies can be ring-fenced for Environmental Enforcement work. It is probable that some premises such as holiday lets are presenting as domestic waste, so avoiding payment for a commercial contract. Enforcement work is likely to identify such premises and therefore will address lost income for the Council as well as rectifying the incorrect presentation of waste which attracts gulls.

Audit of litter bins in gull hot spots

The Council will undertake an audit of litter bins in gull hotspots, (primarily Herring Gull) to determine if upgrades are required to prevent access to the gulls. Design modifications or changes to existing litters bins with the retrofitting of devices or surfaces may be an option which will be investigated. This may prove easier and more efficient to roll out then undertaking to a replacement of existing litter bin assets. An alternative design of a litter bin has also been identified which is designed to prevent Gulls landing on the bin. The highest risk areas would be identified for upgrading of litter bins to gull proof/gull access prevention designs. An initial provision of 30 upgraded bins would be £19,500.

Kittiwake Artificial Nesting Structure (ANS)- Feasibility study

The Council will determine if a Kittiwake alternative nesting structure can be constructed at the terrace in front of the Grand Hotel through a feasibility study to identify the total cost and any barriers. The cost is being met by grant application (subject to approval) from the Combined Authority with a value of approximately £30,000 for planning, design and scope. The Regeneration and Delivery Team are the sponsors of this project.

Construction of a Kittiwake Artificial Nesting Structure (ANS)

Final construction costs of an ANS are unknown but dependent on final design options could be between £100,00 - £2M. This is a very wide estimate to allow for design changes. This is currently unfunded. This does not include maintenance costs. The Regeneration and Delivery Team are the sponsors of this project.

6.0 Summary of proposed recommendations

The five core areas, or 'pillars' of management and delivery identified and recommended in this study to inform the strategy are:

1. Education and communication
2. Waste management services
3. Cleaning services
4. Proofing
5. On-going monitoring and evaluation

In addition, further guidance on gull management may be incorporated into Planning Policy, via the new Local Plan. A summary of the actions under each of the five pillars is provided below.

6.1. Education and communication

An education and communication campaign must be fully costed and deliverable. It must also be sustainable and be adaptable to local needs. It must also have the potential to be implemented on a rolling basis over several years. It is anticipated that a variety of media could be used including social media, billboards, radio announcements and posters. The current signage across the coastal area has been installed over several years and the type of signage varies. Most of the signs were installed after the last upgrade in 2017 and provide mixed messaging. However currently there is no data available on the number of signs still in use and those which have already been replaced by various departments. As such an audit of existing signage must be undertaken before the final cost of replacing such signage can be determined. However, a provisional budget of £5,000 should be set aside.

6.2. Waste management services

The provision of gull proof sacks must be seen as a priority. It is recognised that the use of ordinary black plastic sacks provides an attraction to gulls (especially Herring Gulls). The distribution of such sacks in high priority areas will provide some way to reducing food waste eaten by gulls. However, the Council currently does not have the data on the numbers of residents and commercial premises (including holiday lets) using bags. As such an audit of

existing service provision is required to quantify the number of all properties using sacks, that is, do use wheelie bins.

6.3. Cleaning services (Street Scene)

Guano jetting

The seasonal guano jetting of hot spots is currently not fully funded. A fully costed and funded scheme would ensure the security and availability of this important summer service and the contractors should be retained if required from 2026 onwards.

Litter bins

Provision of gull proof litter bins by a programme of installing replacement and/or upgraded bins in gull hotspots. This can be rolled out easily and at speed, subject to ordering and delivery by the supplier.

Environmental Enforcement – waste and street litter control

Proactive targeting of business and domestic premises which currently do not use gull proof sacks and/or do not secure their waste effectively will require some field work. This can be managed with the ordinary work undertaken by the Environmental Enforcement Team supported by the Environmental Protection Service.

6.4. Proofing

Where complaints of gull nesting or causing nuisance are received, this will be subject to a public health risk assessment which aligns with Natural England's licensing criteria which is a very high bar for action over gulls. Premises owners will be signposted to the advice produced by Natural England. The previous general Gull Grant Proofing scheme will not be reintroduced due to its incompatibility with the duties now imposed on the Council by the Environment Act 2021.

6.5. On-going monitoring and evaluation

All measures will be subject to ongoing review and evaluation managed and coordinated by the appointed officer from the Environmental Protection service This could result in reactive changes to the Strategy however is anticipated that a full review of the Urban Gull Study and Strategy will be undertaken in 2030, this will include a review the environmental impact assessment.

6.6. Additional Planning policy development and the new Local Plan

Regulatory Services will engage with the planning policy team who are currently developing the new Local Plan for Council which is due for adoption in 2030. This study will suggest conditions and policies to be included in the Local Plan with respect to seabirds, including gulls via the Strategy. A policy statement will be suggested that where appropriate new buildings and converted premises should be made suitable habitats for gulls or where sites are deemed inappropriate, designs should be such to actively discourage gulls from nesting. It will also sit alongside the Local Nature Recovery Strategy (North Yorkshire Council, LNRS, 2025).

Planning policy also should consider the impact of new development on the existing population of gulls in the urban areas. Any new development should seek to protect and promote species of gulls where this is practical and safe to do so, whilst protecting public health. Zoning of areas through a planning policy map should be undertaken indicating where sites are suitable and those areas which are deemed unsuitable for nesting on new buildings/conversion.

6.7. Summary table of proposed management measures

Table 4: Summary of proposed management measures, timeframe, complexity and resource requirements

What - Measure	When	Complexity	Resource requirement	Who	Overall difficulty
The Five Pillars					
Education and communication Short term Medium term Long term New signage • Audit • Provision	 Summer 2026 Summer 2027 2030 Autunm 2026 Spring 2027	 Medium Medium Medium Medium Low Low	 £15,000 £5,000	 Environmental Protection and Communications	**Low/Medium**
Waste Management Issue gull proof sacks New gull proof litter bin (new and/or retro fit) • Audit • Provision	 Summer 2026 Autumn 2026 Spring 2027	 Medium Medium	 £30,000 £19,500	 Environmental Protection and Waste Operations and Street Scene	**Medium**
Seasonal cleaning Guano hot spot jetting	Ongoing with increase in	Low	£50,000		**Low**

	spring/summer season			Waste Operations and Street Scene	
Proofing Discontinue proofing grants Provide proofing on-line directional advice	 2025 2026	 Low Low	 none BAU	Environmental Protection and Communications	**Low**
Monitoring Kittiwake nesting survey Herring gull nesting survey and mapping Attitudes and interactions	 Annual 5-yearly Annual	 Low Medium Low	 TBC £8,000 (TBC) BAU	Environmental Protection with specialist contractor	**Low/Medium**

What - Measure	**When**	**Complexity**	**Resource requirement**	**Who**	**Overall difficulty**
Further measures					
Kittiwake Artificial Nesting Structure Stage 2, architectural and structural engineering feasibility study.	Spring 2026	High	£30,000 (TBC)	NYC Regeneration	**High**
Planning Policy and Control • New developments which should design out features to prevent nesting by gulls.	Implementation via the Local Plan 2030.	High	BAU	NYC Planning Policy supported by	**High**

• New development which should provide active or passive provision for gull nesting. • Locality development works to identify areas or districts to which these policies are applicable through the development of mapping.	Needs to be linked to LNRs and Local Plan Policy development but may need further commissioned research / feasibility / guidance written by a specialist.			Environmental Protection and specialist contractor	

Appendices

Appendix A : Responses to the Urban Gull Consultation, 2025

Statement questions	Strongly Agree	Agree	Neutral	Disagree	Strongly disagree
Attitudes and experiences					
Gulls are wild animals and should not be interfered with	24	21	14	22	19
Gulls add value to the character of coastal areas	32	31	18	11	9
Gulls attract more visitors to coastal areas	6	22	29	26	16
Gulls negatively impact the character of coastal areas	12	25	18	16	29
I am aware of or have experienced negative interactions with gulls	35	33	6	7	20
Waste management					
Waste bags opened by gulls create significant issues	45	40	6	5	5
More measures should protect waste and food sources from gulls	49	40	7	1	3
Gulls being actively fed by individuals is an issue	56	28	8	6	3
Waste food, such as discarded takeaway food, attracts gulls to stay and feed in the town	60	36	4	0	0
The provision and frequency of waste collection are adequate to ensure prompt removal of waste, preventing it from being a food resource for gulls	7	22	28	28	16
Cleaning					
Gull droppings create visual and odour problems	39	29	15	10	8
Increased cleaning and jetting in town centres is needed	43	31	19	4	4
Proofing measures					

Statement questions	Strongly Agree	Agree	Neutral	Disagree	Strongly disagree
Gulls nesting creates a negative visual impact	24	19	13	21	24
Nesting gulls on buildings and structures within the town are visually detrimental	34	16	13	14	24
The use and sight of gull-proofing netting to deter gulls from nesting on buildings are visually detrimental	24	19	22	25	12
There should be a greater use of netting as a deterrent on local buildings	17	26	18	19	22
Other proofing measures should be used to deter gulls from nesting on buildings	24	31	23	10	13
Gulls can be deterred from nesting on buildings	22	31	26	15	7
Education and communication					
Greater education could positively change individuals' attitudes and interactions with gulls, such as discouraging the active feeding of gulls	50	35	10	5	0
Additional signage across the town, such as along promenades, in restaurants, and takeaways, could help minimize the food available to gulls	41	34	14	10	1
Resources					
Local authorities should devote resources to managing urban gulls	37	28	12	9	14
The local authority should invest in and provide alternate nesting structures for gulls (specifically	36	40	15	6	3

Statement questions	Strongly Agree	Agree	Neutral	Disagree	Strongly disagree
Kittiwake) to breed on as a way of managing their nesting location within the town					
Future building designs should consider seabird nesting implications	46	38	10	5	1

What else would you like to share about your experiences or views on seagulls as a business or interested party?

The nesting of herring gull and kittiwakes are quite unique species along the Yorkshire coast and with kittiwakes almost exclusively in Scarborough for the country. They are protected species and should remain so to stop unnecessary killing or disturbing of the birds, however, more needs to be done for effective proofing measures. Spa bridge was a prime example of using a method that is not approved and frankly did not work but also created a great deal of public backlash which could have been avoided if things were done different, but hindsight is a wonderful thing! Gulls are a part of the seaside experience and should remain so. As a local company with extensive knowledge of these bird species and with very high success rate of proofing for these birds and working with the council on proofing them we believe we are some of the most qualified people on this subject in a real-world scenario. We are happy to help and provide advice as needed to help create a happy medium for everyone going forward with the issue of nesting gulls of all species.

These birds are a pest which cause a mess due to dragging rubbish out of bins and the amount of excrement they leave. I have also seen people attacked for food which they are holding. The biggest cause of the problem is visitors and potentially locals feeding these birds. They are dependent on human food, and this should not be the case.

I note the impact (and causes) of the issues with gulls are most in the town centre. Therefore, the management of recycling and waste containers and collection is a key issue. In Bar St (for example but happens on other town centre residential streets) the use of gull sacks is not automatic. Tenants are often not aware of the importance. Equally commercial tenants are leaving overflowing commercial bins 24/7 instead of storing them inside. The local authority needs to communicate much more clearly

with businesses and residents about their obligations to use gull proof resources; to take bins inside when not being picked up. This is a particular issue on. bar Street where there are three business (including an Airbnb) leaving bins out on the street 24/7 and these are often overflowing, therefore will attract gulls. As the town centre evolves towards less retail

and more leisure, NYC need to provide clearer information about occupier obligations to manage waste without compromising the destination quality of the town centre. The council need to NOT commit to one supplier to provide grant funded solutions ....and there should be better information about the deterrent options (even the council needs this - for example SBC's investment in fire gel on the bridge was an obvious mistake to anyone with even limited knowledge). Brittania Hotel also need to pay a part in this - their bins are often overflowing and act as a magnet for herring gulls. Enforcement is required as there is a clear detrimental environmental health impact by leaving the bins exposed and accessible to gulls. Artificial hawks flying from buildings in Oslo, Norway seem to work.

What else would you like to share about your experiences or views on seagulls as a business or interested party?

Consideration needs to be made of the impact of urban gulls on bathing water quality at Yorkshire's beaches. Investigations by the EA have shown that they contribute to the bacterial loading at Bridlington South and Scarborough South Bays and therefore the Poor water quality. Any plan needs to also consider the impact on water quality - positives would be reducing reliance of birds on human food sources - better litter management, less opportunities for birds to scavenge or attack, discouraging feeding birds. Negatives would be re-location to new nesting sites in connectivity to (via run-off/drainage systems) the bathing waters - this may simply make current issues worse. Fate of washdown water if a clean-up strategy is employed which again may impact on water quality.

Local people find it difficult to understand that some Seagulls populations are in decline but in Scarborough they are such a nuisance mainly due to over population.

The interaction between gulls and humans is a large problem 90% is from tourists. Building owners should be made to protect their buildings or contribute to the cleaning up. Gulls however will always find another location if moved.

There needs to be greater culling of gulls

I would like to see the town centre cleaned early morning, every morning, before visitors that is, 6am -7am, especially the spring/summer months. Bins emptied, litter picked and seagull mess cleaned and paths sprayed to ensure the streets look clean, odour free for all our town and local visitors.

Kill the eggs to cut the numbers of them and kill the adults as well. we had lot less of them in covid when tourists where not feeding them

Gulls are an inevitable part of seaside resorts. Takeaway litter left in the open or on the street and active feeding by the public inevitably make them bold and mean human food is fair game for them as an extra food source. I don't know how effective nesting deterrents are on buildings. Several large and prominent buildings are badly affected by gull mess,

especially the Grand. The problem with deterring them from one place is that they relocate to another part of town and a new hotspot may be created. I gather the gulls used to spend more time at sea following fishing boats. These are no longer in operation near shore as the industry has been decimated and the operators that remain now concentrate on shellfish. If the white fish industry re-emerged at some point, perhaps the balance would improve.
Meanwhile the best strategy is to provide better litter bins, regularly emptied and put as much public effort into stopping people dropping litter as they have into making people pick up dog mess. These days you are 'named and shamed' very easily if you don't pick that up, but there's no similar outrage at families leaving half-eaten takeaways lying around on the street. This needs to be a campaign that 'takes the public with them'... as in, do not leave it to "they"/"them"/"the council"/"other people" to do, but every person on every street could challenge litterers when they see them, and pick up litter wherever they go. The cleaner streets are the less likely people are to drop litter.
We need to be able to live side by side in harmony with the seagulls as they are normal part of life at the coast - waste needs to be disposed of properly, especially food waste and people need to be discouraged from feeding them - there is enough natural food available to them on the natural environment.
The council need to educate their workforce first. The employee using can 029 in Peasholm park empties food from bins and containers onto the ground daily for birds to feed from.
The birds only learn their aggressive behaviour and gather in large numbers due to being fed or being easily able to scavenge waste food. Sealed bins (and more of them) in busy parts of coastal towns, better rules (and enforcement) for food businesses disposing of waste etc and actual penalties for people caught deliberately feeding the gulls would all help.
Waste left by bins cause gulls to rip bags, when issue is reported and it is on private land nothing can be or is done so it then increases rodent problems when litter is around.
Seagulls in the town centre and on the beach are a menace. They attack you for food. This has happened 3 times to me and my children.

What else would you like to share about your experiences or views on seagulls as a business or interested party?

Gulls seem to be creatures of habit that learn quickly. Over spilling bins left overnight are a problem. Why not have an evening bin collection in the town that would reduce the amount of food waste attracting gulls. Same man hours needed, just a swapping of shifts.
We lived in the old town and herring gulls always nested on our roof. They were no problem. I do think there needs to be some sort of control that is, removing eggs from their nests but leaving one. I know this can be done because the Council's health inspectors did this whilst

being accompanied by representatives from RSPCB each year in the nesting season back in the 80s

I believe additional signs discouraging the feeding of gulls and littering will be a waste of resources. People who feed gulls and people who litter will not change due to additional signs. The only signs that may discourage people from feeding are signs that educate the public on the appropriate diets for gulls (that is, that fish and chips are not good for them). The most effective way to manage gull populations in urban areas will be more efficient waste storage and removal. There needs to be more bins that are emptied more often and businesses that cannot keep their commercial bins tidy should be fined.

In reference to the statement: Gulls can be deterred from nesting on buildings.... I agree, but only where alternative nesting sites have been provided. Evidence indicates that deterrents are effective up to a point, and where utilised, will only displace nesting gulls. These gulls will then find alternative nesting sites in the town. The most effective measure to manage populations is to provide alternative nesting sites within close proximity of existing sites. Kittiwakes are very site faithful and will congregate. By strategically placing ledges on existing buildings (away from public areas) excrement can be managed, and has proven successful elsewhere in the country, where uptake has been almost immediate. Likewise, well placed towers can provide alternative nesting sites away from heavy footfall/businesses. Towers can be small, inconspicuous, and low cost with the right design. Education and awareness is also key to managing the herring gull population, as eliminating feeding and management of waste will play a significant role in reducing human wildlife conflict. In the longer term, creating and restoring natural nesting habitat for these species is key, as young birds will scope out new nesting sites. Providing nesting sites at sea (for exp huts with ledges on offshore windfarm sites) may also limit the number that reside in towns.

The questions are based on the coastal area, which is the gull’s natural domain. The answers to the questions are different depending on whether you want comment on the urban or rural gulls which isn't always clear here. People are positive about seeing gulls in their natural environment such as cliffs but see it as detrimental when they are on buildings and in town centres, or if they are mugging people for food. The issue is far more widespread than just the local authorities and businesses taking action, human behaviours need to change

Seagulls and sea birds in general are integral to the UK coastline, I believe taking actions to minimise the undesired effects on buildings and more advisory information to the public regarding feeding them to be worthwhile. Also, more waste disposal bins to be provided, there are no bins on Scarborough east pier for example once you leave the cafe area.

Gulls can only be described as 'wild animals' if they can sustain themselves in existing numbers by natural food sources and natural nesting sites. The herring and fishing fleets are

long gone; the gull's natural food source has gone so protecting Herring Gulls encouraging their numbers to grow is only going to worsen an existing problem as they are increasingly reliant on human food sources. They continually attack visitors, empty bins and intimidate visitors by swooping at them. Look at the state of the Grand Hotel. At least rats are silent, largely out of sight underground and don't attack you. I appreciate that they cannot be exterminated in 2025 but restricting nesting sites and food availability will have a long-term positive effect in controlling numbers. If you walk along the sea front on a busy weekend around the lifeboat station and observe. the continual deafening shrieking and dive bombing by gulls with tourists' meals ruined by looking over their shoulders and covering their food; anyone of sound mind wouldn't say they enhance a visitors' day out.

Gulls have been part of coastal wildlife probably longer than humans. Most problems appear to be caused by discarded takeout packages / food or left out bin bags. If an unnatural and easy food source is made available, the gulls will make use of it. The discard of general litter is a major problem, action on this would certainly help the gulls back to their natural habitats.

I like them, but they can be a real pain when begging food off residents and tourists. The residents know not to encourage them.

There should be an ongoing program of limiting the seagull population as people very often ignore the signs along the front not to feed seagulls. I have experienced seagulls taking food out of my hands and with the size of the seagulls it is quite a scary experience.

They are a part of living on the coast. It would be great to find ways of reducing the mess created by them either by stopping them nesting in key areas or having a cleaning plan in place.

Many guests comment about the seagull mess around town in the summer months

Gulls are an integral part of living by the coast. People therefore expect to interact with them. Given their conservation status of amber then steps should be taken to look after them, not deter them. People appear to be the main problem with leaving waste food around. Gull proof bins shouldn't be beyond the wit of the council or food outlets.

Kittiwakes should be celebrated and their seasonal presence better explained. An imaginative solution to complaints could be a kittiwake sculpture and info board under spa bridge. People need to understand that feeding herring gulls is a very bad way of interacting both for gulls and humans. A large herring gull puppet/character patrolling the beach and comically interacting with tourists could highlight this at little cost while performing an important educational role. We need to bring fun and imagination to bear on spreading conservation messages about these precious birds while mitigating the effects of our own stupidity which has brought us to this situation

Seagulls should not be discouraged from living in Scarborough. Increased cleaning is needed to keep the town clean both from droppings and waste food being available for gulls

to access. Signage would also be visually detrimental, unless it was very well designed and positive in its messaging. Providing and encouraging gulls to use nesting sites or structures is a great idea. Ways of keeping the nests on buildings less messy should be explored for example, ledges to prevent droppings accumulating on the ground and soiling the walls. Educational info could possibly help but it needs to be positive.

During nesting season shopping in Scarborough town centre is very unpleasant with the mess the gulls make on the pavements and directly onto passersby. Discouraging them from nesting in town and providing then with an alternative would help.

The stench from the pavements is vile. The machine used to scrub sprays full excrement up onto my plate glass windows. There needs to be greater emphasis on cleaning the streets using appropriate jet washing and not just once a day. This is so bad that in summer our customers complain when we leave the entrance door open. For so long the authority's response to this has been less than effective.

We need action now - prior to nesting season

Gull nesting creates smell, excrement and damage to buildings. I don't believe it's natural for gulls to nest on buildings but much of the castle headland has been netted to avoid falling rocks. This stops gulls nesting in their natural habitat. The town centre and Spa Bridge are dirty and potentially dangerous to health. Much more regular cleaning is needed. My observations suggest visitors will not stop feeding gulls as they think it's entertaining. They then seem surprised when attacked. The bins on the seafront are not gull proof and need more regular emptying, particularly during busy periods. This is a public health problem and needs addressing.

Gulls are in decline and consequently protected. They were here before us. They are wonderful creatures. We need to educate people to appreciate them and protect them and to recognise that issues only arise when humans encroach on the gulls' habitats. We need to educate people to love and respect the gulls and to be grateful that we have not yet caused them to become extinct.

Gulls should be protected. Please BAN all things that harm them such as netting, and poisons provide alternate nesting sites.

The sea gull issue is so past signs and deterrents, sea gulls have evolved and even young actively steal food from unsuspecting victims' hands. Licenses are needed to remove eggs and nests, and culling is needed. The culture and awareness of sea gulls stealing food is having a massive effect on sea front business with tourists being put of purchasing take away food.

I am chair of Scarborough Birders. In addition, I carry out annual surveys/studies of Kittiwakes in Scarborough for Shoney Wind Ltd (contact for results of local studies. Amron House, Borough Rd, North Sheilds NE29 6RN). I strongly agree that gull proofing should be

carried out to minimise human conflict in sensitive areas of town that is, above areas of heavy foot traffic. The increasing urban Kittiwake population can be managed, this needs to be done with a clear strategy, the use of artificial sites is essential, less sensitive colonies on buildings should be purely managed through street cleaning. In some parts of town gull proofing of small colonies have moved the birds to the rear of buildings away from the public. This is an area that should also be considered in the Council strategy. The type of gull proofing should depend on the building type. Netting is very effective but needs maintaining. Fire gel tubs will work in conjunction with spikes. Spikes alone do not work for Kittiwakes and will often be used to stabilize nest structures and will also cause chick fatalities.

Kittiwake hotels are working elsewhere should be trialled here

Educating visitors to not feed gulls and dispose of waste properly is needed. Regarding constructing nest sites for Kittiwakes. All spaces on the cliffs are currently occupied so there will be some spill over to spa bridge and the town. Alternative sites would be useful. The question is when these would be full and would the same issue recur further down the line

As I'm sure you know, the Herring gulls are doing what they have evolved to do and making use of an available food source and suitable nesting habitats. It is the human's failure to manage their food waste correctly which is the main contributing factor in this issue-if you were to actively cut off that food source-the gulls would naturally, over time, need to source their food somewhere else. Provision of compulsory closed bins, improved waste collections and fines for businesses and individuals whose negligence cause available food waste are all potential solutions that would help. Cutting off the food source will be the most effective measure along with education of the residential and tourist population. Regarding Kittiwakes-you need to consult with experienced seabird ecologists and consider Kittiwake hotels etc after looking into colony behaviour. Putting fire gel etc on Spa bridge has only made them move more into town closer to other nesters-as they will do for safety-and wasted public money in the process. The Spa bridge will not be damaged if they are left there to nest. It is a much preferable site than in the town centre. They are an endangered species, loved by many, many visitors and need to be protected. Sincerely, local Ecologist born and bred in Scarborough

No such species as a seagull. They are gulls. Herring gulls are the major 'problem' and they're red listed, seriously endangered. And every single problem associated with them is caused by humans. We build buildings for them to nest on, feed them, leave waste food lying around, panic when they try to protect their young and make outlandish claims about them attacking us. The answer is to educate the humans, empty bins promptly, fine people for feeding them and for leaving waste food out. We

Promoting and subsidising the use of roof spikes to deter gulls nesting is a complete waste of time and public money. Gulls are cleverer than you think. They use the spikes by weaving

the spikes into their nests to create a more stable nest site. Don't tell me they don't because I had spikes fitted on my roof and chimney which they then used to stabilise their nest. Roofers are taking the Michael and conning house owners and the council by claiming they deter breeding, they don't.
We have gulls nesting on my roof and there are no problems. Live and let live I say.
Wildlife in the UK is under intense pressure due to human activities. Please leave gulls alone or provide support for them.
Since both gulls are red list, we should accommodate them and find ways to alter human interaction where possible. Signage explaining how privileged we are to share our town with the gulls and ways in which people can avoid unpleasant interactions that is, not eating where they are and disposing rubbish safely which anyway are good habits in the countryside and forests too.
Certain individuals will continue to feed the gulls in built up areas, despite signage. Fines and official orders will be required to prevent them from doing so. There are also insufficient bins in the Whitby town centre - specifically church street/ Henrietta Street/ Tate hill area, to deal with the volume of visitor waste. Takeaway food boxes are large in volume and soon fill up the bins… this is made worse by the fact the solar powered compressing bins have restrictions on the hatch opening and people cannot fit their boxes and cartons through it. People think they are helping by litter picking on the beach, they collect waste in carrier bags and then they will not fit in the litter bin, so they leave the bags next to the bin. Seagulls then come down and tear open the bags looking for food. I think better waste storage and collection is required. Along with the ability to fine repeat offenders that feed the seagulls on the streets or footpaths.
I own holiday accommodation in the town. Some visitors actually enjoy the noise of gulls but rarely the consequences. Get rid of the gulls and put speakers broadcasting gull noises.
As an ornithologist who has studied urban gulls for many years, I am concerned that the majority of gull management measures taken by councils and individual businesses are expensive and ineffective, and there is rarely any scientific basis to them. Netting is only ever effective at excluding gulls when very carefully chosen and properly installed and regularly maintained from there on. This is rarely done as the sector is not regulated, and installation and maintenance are expensive. The result is not only is it ineffective, but gulls are entangled causing avoidable and agonising deaths. This violates laws against killing wild birds as well as animal welfare laws. It is also impossible to net an entire city, so even when effective, netting simply shifts the problem elsewhere. The expense and ineffectiveness of netting and deterrent methods (for example, plastic owls, kites) just lead to more frustration in the public. Both species nesting in urban areas in North Yorkshire (Herring Gulls and Kittiwakes) is also red listed and endangered in Britain, so lethal methods and methods

causing deaths should be avoided. Human behaviour contributes to negative interactions: deliberate feeding encourages muggings and behaviours around nesting gulls increase defensive attacks by gulls. Access to food waste encourages Herring Gulls to forage in towns. Negative attitudes to gulls are often ill-informed and prejudiced by the media. Gull attacks are rare and rarely result in injury (I have accessed many Herring Gull nests for study purposes on rooftops for years and never been attacked, and Kittiwakes never attack people). Solutions should be focused on reducing gulls' access to food and on improving education in the public to avoid negative interactions with gulls and counter misconceptions. People's welfare would be improved if they were better educated and not unnecessarily afraid. Kittiwake towers should be provided as alternatives if they are excluded from nest sites.

Kittiwakes and herring gulls, two seabird species integral to Scarborough's cultural identity, are experiencing significant population declines, raising conservation concerns. They are both classified as Red List species in the UK due to severe drops in their wild populations—kittiwakes since the 1940s and herring gulls by over 50% since 1970. These declines are driven by factors such as overfishing, habitat loss, climate change, and, more recently, avian flu. Their presence shapes the town's coastal character, evoking its maritime heritage. Legally protected under the Wildlife and Countryside Act 1981, these birds cannot be harmed, nor their nests disturbed during breeding season, with herring gull nest removal requiring a Natural England licence for public health or safety reasons only. Conservation is vital not only to preserve biodiversity but also to maintain Scarborough's unique cultural landscape, balancing ecological needs with human coexistence through measures like artificial nesting towers and habitat restoration. Scarborough council has previously made expensive errors in trying to manage gulls and should seek professional ornithological guidance to resolve the issue.

I have grown up on the Yorkshire coast and enjoyed the sight and sound of gulls all my life. My wildlife tourism business depends on attracting visitors to a region which encourages wildlife and invests in protecting this essential part of our natural heritage.

Gulls are a thing of beauty, an integral part of the natural world. Any negative behaviour is brought about by human behaviour and habitat destruction usually by human settlement. Gulls need food and as you rightly point out it is not kittiwakes taking advantage of human waste. The sight and sound of the gulls is welcome, and the behaviour of humans has led to the problem. It is education and tolerance that is needed and maybe visual patrols to ensure food is not dropped or birds fed deliberately although visitors seem to take pleasure in doing this in my opinion. Regular bun emptying in high season may help as buns often get overfilled.

Interestingly during lockdown when no one was about, the seagulls disappeared. I take it that they went back to the natural habitat. So, if the food sources were taken away, as in people stopped feeding them or access to food was denied to them, the problem should reduce significantly over time

Gulls are a part of seaside towns and contribute to the atmosphere that many visitors cherish. A significant part of this is because buildings provide safe nesting locations. It makes sense to reduce food availability for Herring Gulls to reduce human/gull conflict and consider management options where there are specific issues around faeces and hygiene, for instance in areas where there are open-air cafes, but generally promoting a greater accommodation of the gulls share our seaside urban space could be a more constructive approach. Both Herring Gulls and Kittiwakes are Red Listed as species of high conservation concern due to population declines in the UK, and our urban populations are increasingly important in terms of the overall national populations. Specifically in Yorkshire there has been a decline in both species. The Yorkshire coast supports in the region of a fifth of the UK's Kittiwake population, so has a particular importance (c.55,000 pairs from the 116,000 UK pairs population (Seabirds Count 2015-21). Gulls face a range of threats, from climate change reducing their food resources, offshore marine development, unsustainable fisheries and pollution risk (as highlighted in recent weeks). Herring Gulls are intelligent opportunists, but in many cases, they are feeding on agricultural land and other food resources away from their rooftop nests and not always associated with tourists and chips.

Signs celebrating the seabirds and giving more information about them. that is, the difference between herring gulls and kittiwakes, visually and habits. Also informing visitors that they are in decline and info about all local nesting sites.

Kittiwake (KI) and Herring Gull (HG) are red-listed species that have moved into urban areas due to deteriorating natural habitats. They should not be subject to lethal control or interventions that may result in mortality. KI forage at sea and are not aggressive to people. ‘Muggings’ by HG are encouraged by deliberate feeding and access to food waste. HG may aggressively defend nests, but this is limited to the short breeding season and rarely results in health and safety issues. Negative attitudes in the public and media often bias people’s perceptions of gulls. Management is rarely evidence-led, with insufficient evidence gathered on the perceived issues or effectiveness of solutions. Most management measures are unregulated and are expensive and ineffective. Netting must be properly installed and maintained to avoid welfare issues and deaths. Alternative nesting options should be provided if KI are excluded from existing nest sites. The significant numbers of nesting KI on the St Nicholas Cliff - The Spa bridge in Scarborough should be allowed to remain, as the bridge is not a residential or commercial property. Given the conservation status of these species and the ineffectiveness of management measures, funds are likely to be better

spent on promoting positive attitudes to gulls and facilitating peaceful cohabitation. The draft LNRS notes the importance of protecting seabirds in both natural and urban habitats. Education campaigns should aim to reduce feeding and access to waste, and to combat negative public perceptions. Signage could provide information on the need for conservation measures and encourage local pride in our natural heritage and the positive steps taken to preserve it. Measures should also be taken to protect and restore natural habitats, so gulls are not forced into urban areas. All measures should be documented and their effects monitored, so future responses can be evidence-led.

Spreading bird flu and other diseases.

The human population of Scarborough creates vastly more unsightly waste. We regularly dump untreated sewage into the sea; hundreds of tonnes of waste goes to landfill sites every week; the beach, streets and hedgerows are dumping sites for litter, but a few, vociferous, small, minded people take great exception to the seagulls.

Your survey is totally biased which negates results. Education is required: that should not be to not feed birds. Human garbage IS a problem, the gulls ripping those bags is not THE problem. Educate to appreciate and care for gulls. Gulls were here before people came and took their habitat and food sources. Netting traps and kills birds. The bigger problem in NY towns is graffiti, rubbish and hazards that humans create. Deflecting to claim birds are the problem is not fixing the problems in the towns. What is being done about the town drug users? They actually scare me, and their leftovers are hugely hazardous to people and wildlife. By all means create nesting sites for gulls, but ideas like spikes on buildings to stop birds is an absolute disgrace and brings shame on those who instigated this. They need to be removed as a matter of urgency. I hope that you actually take notice of these comments and stop finding excuses to persecute birds.

All Gulls are a natural part of seaside towns. It is the waste of human beings that attracts them into creating litter. Better rubbish bins in greater quantity, littering fines and tax on takeaway outlets should all be explored

Gulls are part and parcel of the coastal environment, and are also a species whose numbers are declining, so everything possible needs to be done to protect them.

Gulls have been living and nesting on the coast since before humans. I feel it is our problem not theirs because we leave food lying around the birds should not be blamed for getting used to that. We need to stop people from feeding them and leaving food around. Culling gulls is not an option, some humane ways of keeping them from nesting on some buildings is okay.

The sea birds are an integral part of the coastal environment, were here before human settlement and should be protected. Undoubtedly, the easy access to food, particularly in the summer months with an increase in numbers of people feeding them and access to open

bins causes a problem. Birds nesting in town can also be a nuisance for those living with them. A couple of years ago a mother and daughter checked in to our accommodation. Both were quite distraught. Earlier in the day they had been walking along the south side and witnessed a man deliberately driving towards and killing a seagull on the road. Some people are obviously also amused by feeding the gulls by throwing food out of a window, on to the road or onto the beach. Signs which are already placed along the promenade don't make any difference. I find it so very sad that these beautiful creatures have to suffer sharing their environment with humans.

Appendix B Urban Gull Study Communications Plan

N.B. This plan is currently in progress and final development but includes the following:

Introduction and background

North Yorkshire Council has carried out this Urban Gull study to formulate a strategy and address the growing challenges posed by gull populations in coastal towns such as Scarborough, Whitby, and Filey. While gulls are a valued part of the region's biodiversity, their increasing presence in urban areas has led to issues including littering, noise, aggressive behaviour, and public health concerns.

The study sets out a balanced approach of protecting gull populations while ensuring that residents, businesses, and visitors can enjoy clean, safe, and welcoming coastal environments. It aligns with the council's wider priorities of supporting thriving places, empowered communities, and a sustainable environmental.

Through a series of short, medium and long-term actions, the study will reduce food sources available to gulls, improve waste management, discourage feeding, and explore sustainable solutions such as alternative nesting structures.

This communications plan for the study is designed to support the action plan and address the challenges faced by the council and North Yorkshire's coastal communities. The plan seeks aims to raise awareness of the issues caused by urban gulls and to explain clearly how the council's actions will help residents, businesses, and visitors. By setting out the objectives in plain language, we can build understanding and encourage active participation in the study.

Objectives

- Raise awareness of the Urban Gull Strategy and the problems caused by gulls in urban areas
- Educate residents, businesses, and visitors on how the council's action plan and vision with help in the short, medium and long term
- Highlight the impact of gull behaviour on litter, public safety, and the visitor experience, while also emphasising the importance of protecting gull populations as part of the region's biodiversity
- Change public behaviour, particularly around waste management and feeding gulls. Residents will be encouraged to use gull-proof sacks, businesses will be reminded of their duty of care to secure commercial waste, and visitors will be asked not to feed gulls

- Build transparency and trust by openly communicating the phased nature of the strategy and action plan. Sharing details of short, medium and long-term actions will reassure communities that we are taking a structured, sustainable approach
- Communications will also strengthen community engagement by positioning residents, businesses, and visitors as partners in the strategy.

Audiences

Internal audiences

- Chief executive Richard Flinton
- Director and assistant director(s) for Environment, Community Development etc
- Leader and executive member, Councillor Carl Les and Councillor Richard Taylor
- Area constituency committees
- Local councillors
- Colleagues

External audiences

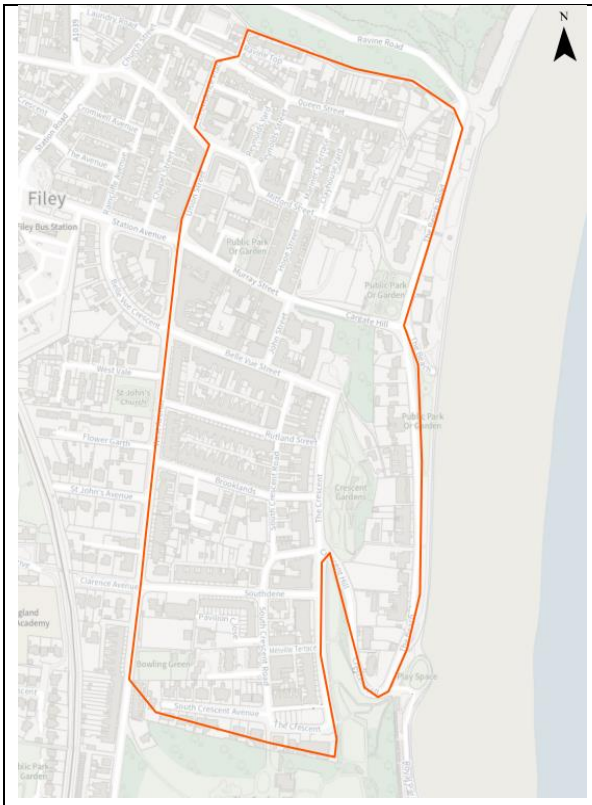
- Residents across North Yorkshire
- Private landlords and letting agents
- Holiday lets/accommodation
- Town and parish councils
- Community and environmental groups
- Businesses (including, tourist attractions, pubs and restaurants, and shops)
- Local media outlets

Strategy and key messages

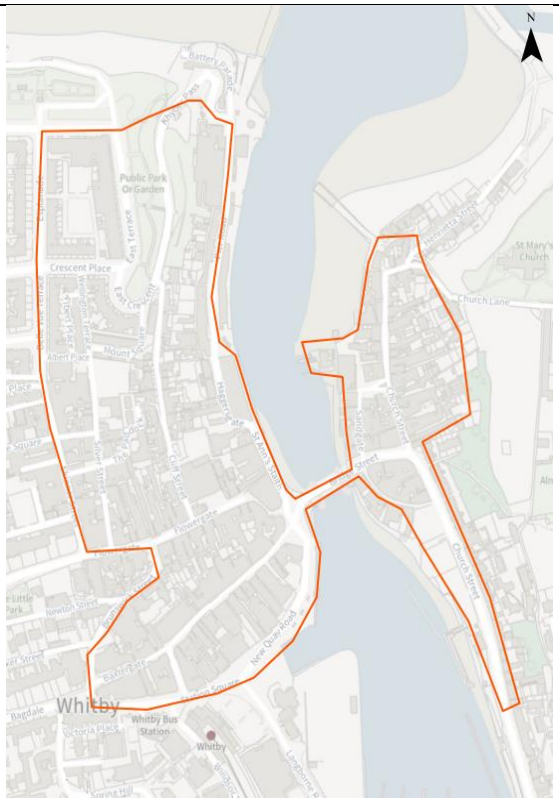
- The communications plan for the Urban Gull Strategy will be clear, consistent, and community-focused
- It will emphasise transparency, collaboration, and practical guidance, ensuring that residents, businesses, and visitors understand both the challenges posed by urban gulls and the solutions being implemented
- Tone will be informative and avoiding technical jargon. Instead, use everyday language that resonates with all audiences
- Campaigns will highlight shared responsibility, reinforcing that small actions — such as securing waste or avoiding feeding gulls — make a big difference to the cleanliness and safety of coastal towns

- Style will be positive and proactive, focusing on solutions rather than problems. Celebrating community efforts, highlight success stories, and show how we are working in partnership with residents, businesses, and environmental groups
- Traditional media (press releases, posters, signage) will be combined with digital channels (social media, council website, videos) and direct engagement (letters to households, businesses, holiday lets).
- We will collaborate with partners on seasonal campaigns to align with peak gull activity, ensuring messages are timely and relevant
- Engage closely with local, regional, national and global (if deemed necessary) media to promote successes and mitigate any negativity through proactive, as well as informative reactive, communications

The following maps will also support the delivery of this action plan:



Filey



Whitby

Scarborough

Key messages

- We want our seaside towns to be safe and welcoming places for the thousands of visitors we attract from all over the world
- Gulls are an intrinsic part of British seaside life. However, they are causing serious and growing issues for us on the Yorkshire coast, particularly in Scarborough
- We need to create the right balance of protecting gulls, and other species of birds that live on the coast, as well as ensuring they don't disrupt the lives of our businesses, residents and visitors
- The birds cause damage to property, can be a noise nuisance, and generate significant amounts of excrement. This is a major challenge for our street cleansing teams who clean hotspot locations twice a day every day
- We are keen to step up our action by thinking creatively about measures to manage the birds while complying with the legal protections that are in place
- The Urban Gull Study sets out a balanced approach of protecting gull populations while ensuring that residents, businesses, and visitors can enjoy clean, safe, and welcoming coastal environments
- The study, which will inform the strategy, is a collaborative effort, bringing together residents, businesses, visitors, to tackle gull-related challenges. By working in partnership, we can create cleaner, safer coastal towns while protecting North Yorkshire's unique wildlife.

Implementation / timeline of activity

All activity will support the strategy outlined above.

Action	Lead	Date	Message details	Status
Short term (Spring 2026) Launch gull-proof sack distribution Education campaign on feeding gulls Business waste control messaging Seasonal guano jetting communications				
Medium term (Spring 2027) Audit and upgrade gull signage Reinforce waste enforcement messaging Share feasibility study results for nesting structures				
Long term (2030) Communicate Local Plan integration of gull management Publicise construction of alternative nesting structures Review and report on the outcome of the study				

Scoring / evaluation

To evaluate the success of these communications plan we will judge the effectiveness of the following.

- Positive media coverage about the Urban Gull Strategy and mitigate any negative publicity.
- Collect the reach and activity data for each social media post relating to the strategy and action plan.
- Conduct regular reviews of the communications plan to ensure its effectiveness and make necessary adjustments.

Appendix C Hot spot jetting locations and frequency of jetting

Hotspot locations for jetting gull guano	**Frequency of jetting**
Bottom of Eastborough both sides	Twice a day
Rock Shop Eastborough	Twice a day
Old Church Eastborough	Twice a day
Age Concern Eastborough	Twice a day
HM Samual Westborough	Twice a day
Old Post Office Aberdeen Walk	Twice a day
Next to Baxters Aberdeen Walk	Twice a day
Waterstones Westborough	Twice a day
JD Sports Westborough	Twice a day
Photo Expert Westborough	Twice a day
Old Game Shop Westborough	Twice a day
Superdrug Westborough	Twice a day
Front of Library Vernon Rd	Once a Day
Iceland and Entrance to Ally Vernon Rd	Once a Day
Side of Poundland Vernon Rd	Twice a day
Mcbean Steps top to bottom	Once a Day
St Nicholas St Marks and Spencer	Twice a day
St Nicholas St Scarborough Flyer	Twice a day
St Nicholas St Nappi UK	Twice a day
St Nicholas St District 4	Twice a day
St Nicholas St Barcalys Bank	Twice a day
Side of Boyes Market Street	Twice Per Week
Spa Bridge Stantions	Once a Day
Entrance and Exit Underground Car Park	Once a Day

Appendix D : Overview of deterrent ('proofing') methods

A brief description of each of these measures is given below with illustrations of their implementation shown in **Error! Reference source not found.** and **Error! Reference source not found.**.

Netting

Netting can be installed on individual buildings to proof or prevent birds being able to land and nest and can be installed on roofs, building facades or on smaller areas, such as individual windows or chimneys. Installation of netting is likely to require the installation of anchor points, poles and frames to support the netting, all of which will require frequent maintenance to repair any damage.

Wires

Similar to netting, wires can be strung across the roofs or areas where birds are not wanted, with a series of taught wires installed running along a series of anchors at distances of one foot or more in height. For large areas multiple wires, spaced sufficiently apart from each other will be required to create an effective barrier to birds trying to land or nest.

Spiking

Spikes, which consist of clusters or tracks of vertically protruding plastic spikes can be installed using silicone adhesives onto areas or structures where birds nesting are not wanted. This can include individual window ledges, building shelves or smaller discrete areas such as the top of an external air conditioning unit or external light. Spikes are designed to prevent individual birds from landing on and being able to build nests.

Fire gel

Fire gel was introduced in 2011 and is a non-toxic oil-based gel contained in small (a few centimetres wide) plastic dishes that can be installed on any structure. The gel is waterproof and is not affected by extreme temperatures, that is, it cannot be washed away and is unaffected by high summer temperatures. It deters birds from its immediate area by emitting a fire like flame, visible only to birds and not humans. It is claimed that bird free fire gel can last and be effective for up to two years (NBC Environment, 2025).

Avishock Track

Avishock track is a low-profile electrified track that can be conformed to any surface, and it is claimed to be durable and flexible and as a reliable way to train birds not to land on almost any surface (Bird X, 2025). It works the same way electric fences are used to manage livestock by emitting a harmless amount of electricity that is just enough to scare and deter the bird from landing and deterring them from returning.

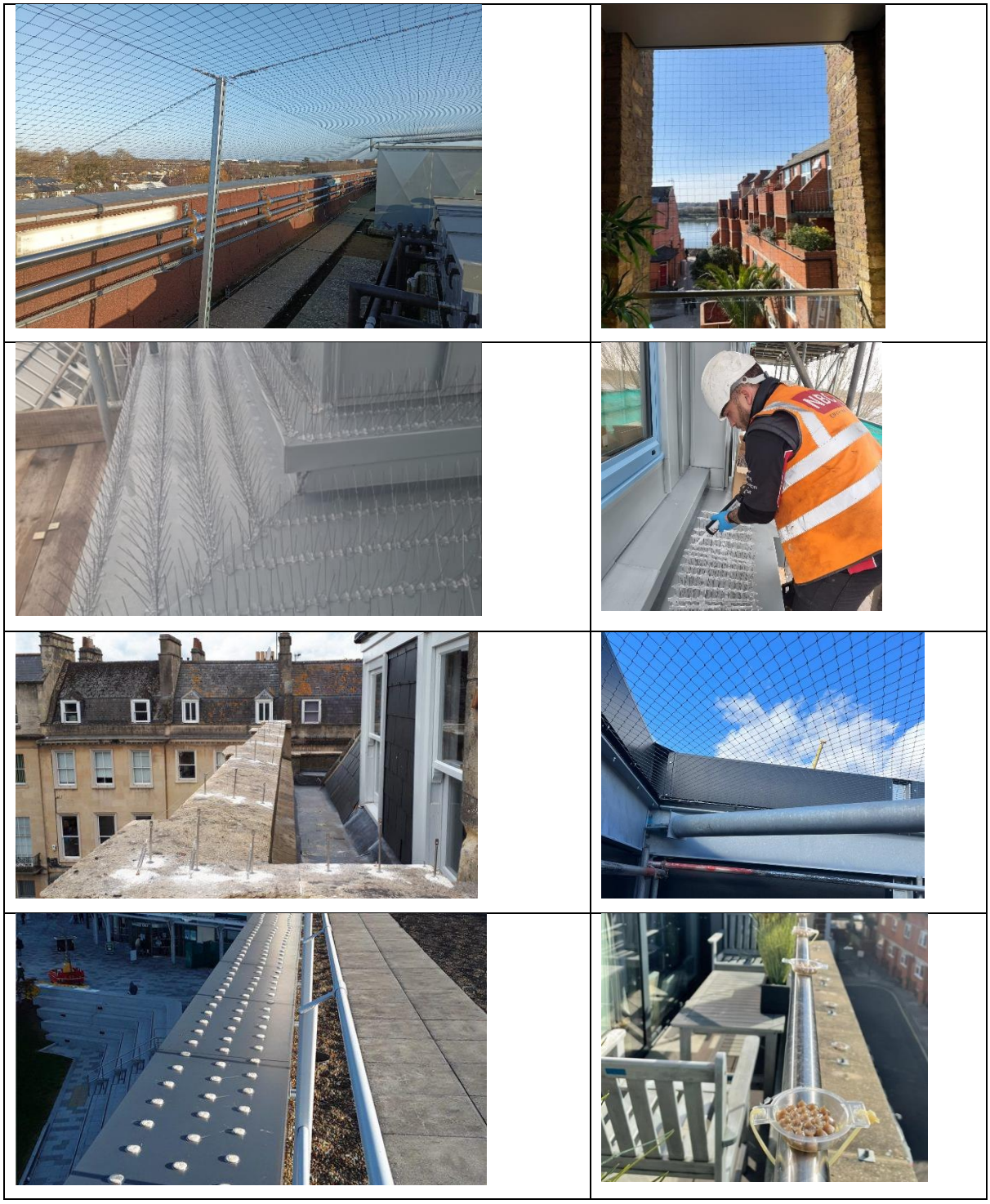


Figure 16: Examples of deterrent proofing measures; netting, spiking, wires and fire gel (NBC Environment, 2025)

Figure 17: Examples of Avi-shock Bird Shock Track installed (Bird X, 2025)

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