



APPLICATION FORM FOR ORGANISATIONS APPLYING FOR GRANT AND DISCRETIONARY FUNDING AND FUNDING IN KIND FROM THE HIGHLAND COUNCIL – Over £10,000 – Common Good Funds

Name of Organisation:

Inverness BID Limited

Name of Project or Activity Requiring Support:

Revised Inverness Gull Management Programme 2024 (City Centre and Immediate Surrounding Area)

Which of the Council's funding streams are you applying to?

(Please provide closing date details where applicable)

Inverness Common Good Fund

Is the amount you are applying for:

Reassignment of **£6,803** to new project activity (previously awarded) and an additional **£9,663**

£5,000 or under Under £10,000 £10,000 or over

Total amount applied for: £ (with additional options for other measures as outlined and for further consideration).

Estimated cost of funding in kind applied for: £ None.....

Please detail what funding in kind has been applied for e.g. Council staff time, use of premises or equipment, waiving of fees or administration support

What type of organisation are you? (please tick all that apply)

Third Sector (voluntary or community) organisation		Community Council	
Registered Charity If yes – Registration number		Company Limited by Guarantee If yes – Company Number SC339914....	✓
Other - please specify.....			

PART 1: ABOUT YOUR ACTIVITIES OR PROJECT

Guidance on completing part 1: [ABOUT YOUR ACTIVITIES OR PROJECT](#)

1.1 What is the name of your activity or project?

Revised Inverness Gull Management Programme 2024 (City Centre and Immediate Surrounding Area)

1.2 When will your activity or project take place? (specifically those for which you are seeking an award from The Highland Council)

Start date (month and year).....20th January 2025.....

End date (month and year).....31st March 2025.....

Location.....City of Inverness

1.3 What activity or project do you want us to support?

For example:.

- *Aims of the project and how you are going to do it*
- *Help with running costs or for a specific project or activity?*
- *Who will benefit*

Please note that the Council will be unable to provide any resources not specified on this form or supporting information.

Background and Revised 2024 Programme Proposal

Funding of £13,606 was approved for the 2024 Inverness Gull Management Programme 2024 with a match fund of £6,419 agreed to be provided by Inverness BID.

In February 2024 Nature Scot updated their guidance as follows:

[Guidance - gull management | NatureScot](#)

The impact of the changes resulted in less than 10% of eggs/nests being removed in 2024 compared to 2023.

From May 2024 to date there has been additional extensive administrative and strategic input needed including to continue ongoing dialogue and collaboration with Nature Scot to ensure that the programme going forward, and in partnership with other North BIDs can meet the new objective of applying a plan-based approach in the City Centre (and immediate surrounding area).

The updated guidance places a stricter focus on what may constitute a H&S risk (licensable) and what may be deemed to be a nuisance (not licensable) including per the 1981 Town and Countryside Act.

The plan-based approach applied has been stated by Nature Scot to have the objective of minimising license applications as gulls will have moved elsewhere or will have developed behaviours that don't negatively impact on people.

Nature Scot have confirmed the purpose of a collaborative plan is to reduce the impact

of gulls to people in Inverness while not affecting the conservation status of the gull species.

Due to the above, the project over the Summer opened a Gull Incident Reporting portal to capture evidence of current impact: [GULL INCIDENTS IN INVERNESS CITY CENTRE Survey](#)

Full details of survey results will be used to assist with any licence applications for the 2025 Gull Management Programme (subject to funding approval). Given the greater emphasis on 'disrupting pre-nesting behaviours' :

Following the latest meeting with Nature Scot on 13th December 2024, a draft proposal for additional/new activity was worked on in collaboration also with other BID partners.

The current position is therefore as follows:

- There is a project underspend of **£6,803** in respect to the 2024 ICGF allocation.
- Approval is sought herein to reassign the underspend and approve additional funds to allowing the following activities to be undertaken:

Proposed Pre-Nesting Gull Management Programme 20th January – 31st March 2025 (reallocation of funds):

Item/Activity	20 th January 2025 - 31 st March 2025
Old Nest and Nest Material Removal	Removal of all old nests and nesting material. 2 x days including machine hire, and sub-contractor.
Bird of Prey	Use of a Falcon Bird of Prey three times weekly (in accordance with specialist's availability) for period February to March 2025 and related activity costs.
Lasering Programme & Human Disturbance	Training an additional operative, and provision of a disturbance lasering programme 7 days weekly from 3 rd February 2025 to 31 st March 2025. Recommendation: 'as often as possible' to discourage roosting. 2 hours daily (8 weeks) x 2 operatives = 224 hours.
Do NOT Feed the Gulls Campaign	Per the East Ayrshire model, activity recommended and to be included in the 55k BID Eat and Drink Guides and posters/social media. Recommended by NS that the campaign further <u>utilise</u> social media and local radio to help raise awareness.
Updated Premises Guide (including guidance on premise installation of netting, fire gels and spikes etc)	In addition to current guidance and consents sought in advance of licence applications and activity, updated guidance to be collated and issued to all programme premises. Activity required to assist with 2025 licence applications <u>and also</u> to ensure that pre-nesting activity is optimal. Roofs not easily accessed recommended to have nets/spikes installed permanently at cost to premise owner.
Rotation and provision of <u>additional</u> scaring devices.	Recommended use of Bird Spiders and Reflect <u>A</u> Bird devices which are to be moved regularly. Recommended that programme is evaluated and data recorded for efficacy by NS.
East Ayrshire Model and BID/NS Group	Recommended by NS that Inverness seek to replicate the model used by East Ayrshire to displace gulls to other areas, <u>and also</u> requirement for ongoing meetings with NS and partners during the noted period.

Nature Scot have stated even with these measures ‘It is important to note that although we may see benefits within and after the first year of this pro-active and positive shift in managing gulls. We may not have a noticeable difference after one year, and this may take multiple seasons of continued decline in conflict between people and gulls and a slow progression towards [*sic*] co-existence.’.

Nature Scot commented further in regard to the proposal:

‘We are pleased to see the pro-active nature of this proposal, but we would stress that the measures being used to prevent and deter need to continue where possible throughout the breeding season. So long as any activity that may impact a nest are licenced, all other satisfactory alternatives must be maintained as much as possible.’.

Due to the above, the activities proposed herein will require inclusion for funding consideration for the period 1st April 2025 to 31st March 2026 and ongoing so this initial request in context, should not be assessed as being a ‘one off’ requirement.

NB: Appointment of a consultant ornithologist/ecologist to be scoped by Highland Council with it further being recommended that mapping is undertaken (out with the scope of the current application) and initiatives such as gull proof bins and waste management also to be explored and potentially undertaken by Highland Council.

Further detail was also provided to the **City of Inverness Area Committee** by Nature Scot in November 2024 via Chris Donald, Head of Operations Central Highland:

Text below (Author Nature Scot):

Gull Licencing Briefing for The Highland Council – City of Inverness Area Committee.

Gull status changes

The latest Seabirds Count census shows that numbers of breeding gulls in Scotland are down by between 44% and 75% depending on species. The declines are attributed to factors such as changes in food availability and land use, with some species also suffering losses because of recent devastating outbreaks of avian flu.

Birds of Conservation concern: difference between seabird census 1998-2002 and 2015-2021

Herring Gull – **RED – declined by 44%**

Common Gull – **RED – declined by 53%**

Lesser black-back Gull – **AMBER – declined by 48%**

Great Black-back Gull – **RED – declined by 63%**

Black-headed Gull – **AMBER – declined by 75%**

A recent update on the Birds of Conservation Concern categories moved Common gull and Great Black-backed Gull from amber to red list. This move was as a result of a re-analysis of population data after the impact of Highly Pathogenic Avian Influenza (HPAI).

Update to licensing approach

Since removing gulls from the General Licence in 2019, we have been assessing

demand for licenses while working with local authorities, pest controllers and the public to emphasise the requirement for preventative, non-lethal measures.

For the 2024 breeding season, in light of the latest population declines and the ongoing impact of HPAI, the guidance for applicants has been clarified further to ensure that applicants are aware that licences can only be issued for reasons of **clear public health and safety issues**, and **where other alternatives are not effective**.

We communicated the changes that were made with stakeholders through a series of emails directly to licence holders, pest controllers and local authorities.

An issue removed or a managed, positive and collaborative approach?

Gull species are generalists and opportunists and will take advantage of artificial conditions cities provide which meet their needs.

Inverness is a coastal city and therefore will always provide an attractive environment for gulls to exist. The city is also rich in natural resources which are utilised by gulls of several species.

With these facts in mind the question is: **how can we adapt to live with gulls and minimise the negative impacts they have on residents and visitors.**

There is an opportunity for Inverness city to lead the way for sound practical management without negatively contributing to the conservation status of these declining species.

Points of conflict

Understanding the difference between a risk to public health or safety and a nuisance to the public has been the biggest point of confusion and conflict.

There is no licensable purpose within the legislation to issue a licence for nuisances.

Legal counsel was sought while carrying out the review of the gull licencing function in 2023.

It was clear from legal guidance that although in some circumstances behaviours exhibited by gulls can constitute a risk to public health or safety, in some cases they will be a nuisance to the public.

As such, our revised guidance document clarifies when a behaviour exhibited by a gull would qualify as a risk to public health or safety and when it would be considered a nuisance.

Despite the communications that were circulate to stakeholders, licence applications continue to fail in terms of provision of required evidence, and as a result a greater number of licences were refused in 2024 compared to previous years.

Additionally, we have encountered a lack of understanding or willingness to carry out satisfactory alternative measure to licenced activities, such as spiking, netting or using a variety of scaring methods.

We do accept that in some cases not every alternative will be satisfactory or appropriate,

however, a licencing officer does require the evidence to justify this position.

However, despite a greater number of licences being refused, there were still over 600 licences issued in Scotland during 2024.

Guidance –

<https://www.nature.scot/doc/guidance-gull-management>

<https://www.nature.scot/doc/guidance-gull-identification-and-annual-cycle-guide>

<https://www.nature.scot/doc/birds-licensing-public-health-and-safety-issues-nesting-birds>

<https://www.nature.scot/professional-advice/protected-areas-and-species/licensing/species-licensing-z-guide/birds/birds-licences-public-health-and-safety-and-air-safety>

City of Inverness – a way forward

A plan-based approach

Population and spatial distribution of nesting gulls by species - baseline

Locations of public health and safety areas –

Hospitals

Health centres

Schools

Food processing and preparation areas

Impact hotspots – baseline

Properties

Species of gull involved

Categorise impacts

Existing deterrents – baseline

Roof deterrents – map

Location of food waste hotspots

Identification of potential gull breeding and roosting sanctuaries - map

Communication and education campaigns

- On going campaigns to general public and businesses on waste management.

Measures

- Provision of THC approved gull proof waste receptacles
- Provision of alternative gull nesting sanctuaries where presence can be tolerated
- Installing roof deterrents to prevent gull nesting and roosting opportunities

Roles and responsibilities

The Highland Council

	<ul style="list-style-type: none"> • Identify public health and safety areas • Ensuring new buildings and modifications designs do not to provide gull nesting and roosting opportunities • Advising on approved gull proof waste receptacles • Provision of THC gull proof waste receptacles for THC managed facilities • Advice on applying gull deterrents to historic and listed buildings • Identifying and establishing gull breeding sanctuaries • Ongoing communication and education campaigns on waste management and application of NatureScot guidance is followed especially key principles and hierarchy of gull management options.
NatureScot	<ul style="list-style-type: none"> • Advice on categories of impact, deterrents, mitigation, hierarchy of gull management options and licencing tests • Promote guidance especially key principles and hierarchy of gull management options.
Business community	<ul style="list-style-type: none"> • Installing approved and effective gull nesting and roosting deterrents • Provision of gull proof waste receptacles for THC managed facilities • Ensure NatureScot guidance is followed especially key principles and hierarchy of gull management options.
Property owners	<ul style="list-style-type: none"> • Installing approved and effective gull nesting and roosting deterrents • Provision of THC approved gull proof waste receptacles
Gull management contractors	<ul style="list-style-type: none"> • Ensure best practice as per NatureScot guidance in provision of services to customers
General public	<ul style="list-style-type: none"> • Awareness of the issues with gulls and role in minimising the issues.
NatureScot October 2024	

1.4 Does your activity or project involve building or landscaping work?

Yes No

If yes please answer both a) and b) below.

a) Does your organisation (Please tick):
Have ownership of the land or building

Yes No

OR

Hold at lease of at least 5 years that cannot be ended by the landlord?

Yes No

b) Is planning permission needed for your project? Tick one option below.

Planning permission not required

Planning permission required and has been granted

1.5 Please tell us how your project or activity will help the Council to meet its Public Sector Equality Duty to:

- Get rid of unlawful discrimination, harassment and victimisation;
- Make sure that people from different groups* are treated fairly and have equal chances to use services and that there is more equality between groups*;
- Make sure that people from different groups* get on together.

*Groups are people who have “protected characteristics” in the Equality Act: age, gender reassignment, pregnancy and maternity, religion or belief, sexual orientation, disability, marriage and civil partnership, race and sex.

For example are people with protected characteristics likely to face barriers; how you intend to tackle these barriers; does your project promote inclusion?

N/A

1.6 Where relevant and appropriate please describe any contribution your project may make towards promotion of the Gaelic language?

N/A

1.7 Please tell us if you have spoken to anyone about your application for advice and support – e.g. Local Highland Council Elected Member, Community Council Member, Council Staff, local Council for Voluntary Service (CVS) – If yes, please provide details:

David Haas, Inverness City Manager

1.8 Please tell us about any funding in kind you are seeking from the Council:

Detail i.e. premises, facilities, staff time, waiving of fees	Estimated value
N/A	

1.9 Please provide a breakdown of how much will your activities/project will cost and how much Funding you are applying for from The Highland Council:

Item/Activity	20 th January 2025 - 31 st March 2025	Total Applied For
Old Nest and Nest Material Removal	Removal of all old nests and nesting material. 2 x days including machine hire, and sub-contractor.	£1,850
Bird of Prey	Use of a Falcon Bird of Prey three times weekly (in accordance with specialist's availability) for period February to March 2025 and related activity costs.	£3,770
Lasering Programme & Human Disturbance	Training an additional operative, and provision of a disturbance lasering programme 7 days weekly from 3 rd February 2025 to 31 st March 2025. Recommendation: 'as often as possible' to discourage roosting. 2 hours daily (8 weeks) x 2 operatives = 224 hours.	£3,771
Do NOT Feed the Gulls Campaign	Per the East Ayrshire model, activity recommended and to be included in the 55k BID Eat and Drink Guides and posters/social media. Recommended by NS that the campaign further utilise social media and local radio to help raise awareness.	£2,750
Updated Premises Guide (including guidance on premise installation of netting, fire gels and spikes etc)	In addition to current guidance and consents sought in advance of licence applications and activity, updated guidance to be collated and issued to all programme premises. Activity required to assist with 2025 licence applications and also to ensure that pre-nesting activity is optimal. Roofs not easily accessed recommended to have nets/spikes installed permanently at cost to premise owner.	£525
Rotation and provision of additional scaring devices.	Recommended use of Bird Spiders and Reflect A Bird devices which are to be moved regularly. Recommended that programme is evaluated and data recorded for efficacy by NS.	£3,800
East Ayrshire Model and BID/NS Group	Recommended by NS that Inverness seek to replicate the model used by East Ayrshire to displace gulls to other areas, and also requirement for ongoing meetings with NS and partners during the noted period.	N/A
Total Additional Activity Cost £		£16,466
Unspent Project Funds Available/Permission to Reassign		£6,803
Total Additional Funding Request £		£9,663

*See guidance notes for specific funding stream to see if you are able to apply for more than one year of funding.

- 1.11 Please tell us how you know that there is a need for this activity or project and how your approach will meet this need. This might include:
- a. Community support for your project (e.g. surveys, etc.)
 - b. Statistics which show the need for your project (e.g. unemployment figures, crime statistics)
 - c. Evidence from similar projects which shows that they have worked (e.g. research from elsewhere or evaluations of previous local work)

The report to Inverness City Committee from the Inverness City Manager and the Policy and Advice Manager, Scottish Natural Heritage on 13th February 2012 established the need for and benefits of this project which has been ongoing since this date with annual applications to support continuation.

- 1.12 Is this a new or additional activity or project? – Yes No
- If yes, what change will your activities or project make in your community?

N/A

If No, how has your activities or project been funded in the last three years?

The project has received part funding from Inverness Common Good Fund in the since 2012.

- 1.13 Please tell us how you will know that your activities or project is working and that you are benefiting your community. You only need to provide targets for the years in which your project will operate. See the detailed guidance for examples of targets.

Activities Measurable Outcomes

Activities will be measured quantitatively and qualitatively. The current proposal is determined to be therefore a starting point with survey and mapping also being required at a later stage (recommended to assess baseline):

Old Nest & Nest Materials Removal – Completion of two-day clearance with machine hire and sub-contractors. Reduction in nest rebuilding at key locations, monitored via photographic records and site inspections.

Bird of Prey Programme – Falconry deployed three times weekly (Feb–Mar 2025). Reduction in nesting attempts and roosting activity, measured via site surveys and reported sightings.

Lasering Programme & Human Disturbance – 224 hours of disturbance activity delivered. Reduction in roosting birds, measured through field observations and comparative nesting data.

Do NOT Feed the Gulls Campaign – Public awareness campaign rolled out across social media, print, and radio. Engagement/reach measured via social media reach, interactions, and reported feeding incidents.

Updated Premises Guide – Guidance issued to all programme premises. Uptake of recommended deterrents (netting, spikes, fire gels) tracked via business feedback and site visits.

Scaring Devices – Deployment of Bird Spiders & Reflect A Bird devices with regular repositioning. Effectiveness monitored through site observations and comparative nesting activity.

- 1.14 If it is intended that this activity or project continue beyond the period of Council support, how will it be funded?

The report by Scottish Natural Heritage established that it would be necessary for a number of years to intervene in the gull breeding cycle by egg and nest removal in order to reverse the increase in the existing population and then reduce numbers.

BID has committed budget to the project for future years and it is proposed that a future application for funding be made to ICGF.