



Beaver Consultation

Response by National Parks England

November 2021

Summary

1. National Parks England (NPE) exists to provide a collective voice for the nine English National Park Authorities and the Broads Authority – all of whom are Local Planning Authorities. NPE is governed by the Chairs of the ten Authorities. Our response to the [Defra Beaver Reintroduction and Management Consultation](#) represents the collective view of officers who are working within the policies established by the National Park Authorities (NPAs) and the Broads Authority and follows internal consultation with all ten English National Parks represented on the Ecologists' Working Group.
2. The National Parks and Broads Authorities cover 9.7 % of the area of the country and all authorities are actively involved in Nature Recovery projects, working in partnership to deliver landscape scale outcomes for nature.
3. Whilst some National Park Authorities may respond individually and specifically in relation to their local circumstances, this response brings a consolidated response from the English National Parks and deals with some fundamental principles that require further consideration. In summary, we agree with the principle of beaver reintroduction for the benefits they can impart on ecosystems. We feel following best practice in relevant countries across Europe to learn from their experiences would also be wise as well as the more recent experience across the UK. We wish to also emphasise the following key points:
 - a. The process for wild releases should be made to be as easy as possible to prevent unlicensed releases, but licences are considered necessary for example, to prevent disease spread and make sure local stakeholders are involved.
 - b. NPAs agree that the liaison with stakeholders is critical to success of beaver reintroductions and future populations.
 - c. It is important to recognise that every river catchment or area that may be considered for reintroduction is different, with differing physical characteristics and land use. As a result, the scale of ecological change will be highly site-specific and dynamic in line with natural functioning of river ecosystems. Monitoring regimes and project plans may have to vary within these.
 - d. We are seeking further clarification from Defra on the length of this strategy, as in 5-10 years, the situation and size of beaver populations may be different and may require the strategy to be revisited.
4. If you require any more information, further practical examples or have any questions

regarding this response please contact us.

Question 6: Do you agree or disagree with the proposed approach to beaver reintroductions? Please state your reasons and supporting evidence. If you disagree, please provide any suggested alterations or alternatives and supporting evidence.

6.1 We agree broadly that each site should be looked at individually and have a site-specific plan. This should also consider important local habitats and species, as well as those that are protected and scheduled. There should also be consideration of the catchment area, beavers may spread beyond the initial release catchment area, so any site-specific plan should take this into consideration as well. While we recognise that site-specific plans will be expensive and take time, they are important for both ecological reasons and for stakeholder participation.

6.2 Lessons can be learnt from the experiences in Scotland where beaver populations have more than doubled in the last three years. Although this increase is positive, in some areas this has led to increased conflict. The need for future management of populations needs to be well thought out with clear guidance on the mitigation hierarchy, who is responsible, and where possible avoidance of licences to kill. Also a plethora of examples are available from mainland Europe, where robust studies have been undertaken in equivalent landscapes. Further analysis of these studies is recommended.

6.3 In terms of timescale, this will depend on habitat and location and there will not be a specific 'end point'. Most Parks feel the timescale is appropriate to determine the medium term effects, but there is understanding that changes may take place over a longer period of time. There is some thought that a 10-year project is challenging to commit to and fund. A time-bound approach, with a review at the end of that time, is however recommended, although it is understood that ecosystems will continue to develop.

6.4 We do not feel that each area or project necessarily needs a beaver reintroduction Officer as this could be expensive and take funds from other elements of the work. There is potential for regional roles or more central co-ordination.

6.5 Consideration should also be given to the wider issues, the need for increased natural flood management, improved carbon storage and nature recovery networks. Rivers provide an opportunity for natural corridors but many are failing in quality as they are restrained and surrounded by more intensively managed areas. The introduction (or continuation) of buffer zones through agricultural schemes and catchment initiatives would be a major benefit, in which beavers have a role to play. This could also provide alternative funding mechanisms for land managers leaving space for beavers to influence the environment.

Question 7: What criteria, in addition to those listed above, do you think projects should meet to be granted a licence for wild release? Please state your reasons and supporting evidence.

7.1 We feel a monitoring plan is required for any release and should include locally important habitats and species, as well as protected species. Ideally, the projects should be monitored long term, and should be assisted by national co-ordination on beaver reintroduction.

7.2 NPAs would be happy to share data through a national coordination initiative and would encourage projects they are involved in to do so. Data should be openly available from all

projects through an open-source data model. This will support future projects, similar release projects, and add to our collective knowledge for nature recovery initiatives.

7.3 Licence applications should value the positive outcomes as well as potential negative outcomes, and look at the issue holistically. Having additional guidelines about the level and detail of the information required for the licence application would help with this.

7.4 We would like to see positive weight also given to releases which contribute to strategic environmental outcomes e.g. catchment scale restoration, natural flood management benefits, contribution to local nature recovery strategies, benefits to priority habitats and species etc. National guidance would be welcome on dispute resolution to address possible instances where a single opposing landowner or land manager could potentially block a release.

7.5 A risk register, which identifies financial, social and biosecurity risks, which is maintained, reviewed and updated throughout the project, would also be useful.

Question 8: Do you agree or disagree with the proposed approach to existing wild-living beaver populations? Please state your reasons and supporting evidence. If you disagree, please provide any suggested alterations or alternatives and supporting evidence.

8.1 We generally agree with the approach to retain existing populations. While we feel existing populations should remain, we would like to note that the licensing application process should encourage applications (and thus have more approvals), in order to prevent unlicensed releases. We would also encourage local collaboration and partnerships with support to manage the impacts where they occur.

Question 9: Do you agree or disagree with the proposed approach to licensing of future beaver enclosures? Please state your reasons and supporting evidence. If you disagree, please provide any suggested alterations or alternatives and supporting evidence.

And

Question 10: What criteria do you think should be taken into consideration when determining whether or not to issue an enclosure licence?

10.1 While we do not want to remove the option of future beaver enclosures completely as they may be appropriate in exceptional circumstances for scientific reasons, we do not believe there are many current examples of when this would happen as most releases should be into the wider landscape. That said, beaver enclosures could support initial stakeholder engagement and projects in specific catchments, such as upland catchments in England where there is less tree cover and fewer local examples, or where habitat is developing/not quite ready in the whole of a catchment. Enclosures could be used as soft releases, for future wild releases. Over the long-term, however, we would not encourage this as a beaver reintroduction method.

Question 11: Does the management hierarchy cover management actions you would expect?

11.1 We generally agree with the management hierarchy as long as it is enforceable. This would seem practical if beaver designated a European Protected Species as this is the case for other species. We are however seeking additional description and clarification on the thresholds or triggers to intervene and what constitutes 'damage', 'unavoidable', 'last resort' and similar language. This is critical to avoid some of the generically similar issues that have

happened in relation to the licence to control buzzards, for example. This could be achieved based on real world experience gathered by project officers and contributed via a national project lead. Additionally, the Management framework will be crucial to evaluate what management may be able to be undertaken in catchments without a licence, for example notching dams and inserting pipes.

Question 12: Excluding direct payment for management activities, what other support do you think should be available and to whom?

12.1 We believe having local officers that are adequately resourced who could provide 1:1 advice, including on catchment sensitive farming, and supported as part of a national network to ensure consistency of approach would be useful.

12.2 Support should be available to encourage land managers to set aside space in riparian areas where beavers occur, when there may be direct conflict with other land use types (e.g. arable). This support could offset loss of revenue from allowing beavers to modify riparian margins and could be available as a stand-alone option for land holdings located in proximity to known beaver colonies – perhaps available to land holdings not participating in other schemes or incentives, but also available in addition to those schemes where not otherwise covered. There should also be an easy way for land managers and members of the public to report when beavers move on to a new area of land to facilitate eligibility for this kind of support.

Question 13: Are there any specific areas where guidance is required? Please provide details.

13.1 We would appreciate more detailed criteria to assist with assessment of feasibility and the management actions that can and cannot be undertaken on land without a licence. This guidance should be available in accessible formats for all land users, and not require specialist input to assess or determine at a basic level. The information in Morris and Mouskey definition of favourable conservation status underpinned by Graham et al 2020 'beaver habitat index' needs to be expanded and made readily available to inform decisions at a local (catchment) scale. Guidance on its application is needed for both potential release applicants and the licensing body.

Question 14: How would you prefer to access advice and guidance (e.g. information on website, via email, focal point for enquiries etc)?

14.1 Advice and guidance should be easily available online. Additional measures such as undertaking local seminars/farm visits to discuss issues/approaches, publishing within land management and farmer magazines/newsletters and having information available through local farm advisers and local NE staff will also be useful in disseminating the necessary information to the widest audience. A designated key contact within Natural England in an area would also be useful.

Question 15: Would you (or an organisation you are involved with) consider preparing an application for wild release, if the approach proposed in this consultation became national policy? If yes, please provide the general location where you might consider applying for such a release.

15.1 Applications will be different for each National Park Authority depending on whether/how much land they own. However, we imagine NPAs will be enthusiastic partners in most projects within their areas.

For further queries please contact Gill Thompson, National Park Ecologist Working group
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