

River Stour (Kent) Internal Drainage Board – Consultation Response

Approach to beaver reintroduction and management in England (2021)

Q1. Would you like your response to be confidential?

No

Q2. What is your name?

Peter Dowling

Q3. What is your email address?

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Q4. What is your organisation? If you are responding as an individual, please state 'individual'.

The River Stour (Kent) Internal Drainage Board

Q5. Please briefly describe your interest in the consultation.

The River Stour (Kent) Internal Drainage Board (RSIDB) is a local flood risk management authority, formed under the Land Drainage Act 1930, and a Risk Management Authority (RMA) under the Flood & Water Management Act 2010. Its primary functions are land drainage, flood risk and water level management and it has a duty to conserve and promote biodiversity. The RSIDB is funded by Drainage Rates paid by agricultural landowners within its drainage district and Special Levies on Local Councils. The Board is made up of Elected Members (representing ratepayers), Appointed Members (appointed by District Councils) and a Co-opted Member from Natural England.

The RSIDB works very closely with the Environment Agency, County and District Councils and many others to provide joined-up management of the Stour catchment river network in East Kent. Its main activity is the routine maintenance of IDB designated watercourses to maintain channel storage and flow capacities for the purpose of drainage and local flood risk, and to provide appropriate water level management for the benefit of the local environment.

As a result of increasing reports of beaver activity in the Hacklinge Marshes area, the RSIDB joined with other key stakeholders to form the East Kent Beaver Advisory Group (EKBAG), which includes Natural England, the Environment Agency, Kent Wildlife Trust, the Kentish Stour Countryside Partnership, Wildwood Trust and the RSIDB, with the intention of establishing the likely number of beavers in the area and to record activities and impacts, both positive and negative, with the further intention of developing a range of mitigation measures and advice for those affected.

The RSIDB welcomes the Government's plan to protect and substantially improve the natural environment and fully supports local biodiversity (the RSIDB's latest Biodiversity Action Plan can be viewed here: [2021-RSIDB-BAP.pdf](#)). Whilst it is recognised that the reintroduction of beavers will provide many benefits, the RSIDB is concerned that some of the negative impacts, including to local ecology, may be overlooked. It will be essential to ensure that RMAs are given the ability and funding to directly manage and mitigate the risks and impacts as appropriate.

Q6. 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.

Agree in part.

The potential benefits likely to result from the reintroduction of beavers are acknowledged and welcomed but we are concerned that the negative impacts, whilst flagged, are not given sufficient weight or focus. The lack of a clear commitment to funding for RMAs is a particular concern.

The stated approach under item 60 of the consultation document provides a good basis for going forward, subject to the following:

- It is agreed that every project must be sufficiently funded for all aspects of reintroduction, including provision of advice and most importantly the management of impacts. However, consideration must be given to funding for the longer-term, not just the initial 5-10 years.
- Substantial stakeholder engagement is essential, and this must extend across the whole of a river catchment, not be restricted to a project area, as beavers released in one part of a catchment will naturally spread throughout over time. It would make sense to ensure that initial releases are to upper catchment areas, which will allow activity to be monitored as they gradually extend into higher risk lowland areas. Stakeholder consultation should be led by Steering Groups, which should include all local RMAs.
- RMAs must be funded to help manage and mitigate against the increased risks, particularly in lowland areas. All risks must be properly considered, including flooding and water loss (many water level management assets retain artificially high water levels during dry periods to support and protect upstream habitats and species).
- The proposal for a detailed and fully funded Project/Management Plan is supported, but consideration must be given to funding for the longer-term, particularly for lowland areas.
- The proposal for a Local Beaver Officer to support and advise stakeholders is welcomed, and this role will need to take an informed and balanced approach to be of most benefit.

Q7. 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

Regrettably, we remain opposed to the further release of beavers until the following aspects have been properly addressed:

- Greater emphasis is needed on the suitability of release locations and also the long-term health and welfare of the beavers.
- It is still unclear how RMAs' inevitable additional workload will be funded, to guard against or mitigate damage to flood and water level management infrastructure.

- Local experience has shown that it is extremely difficult, despite best efforts, to recapture beavers when necessary (for return to enclosures or for relocation). A nationally agreed and reliable method for reliable and humane capture is needed.
- RMAs must be given a licence/exemption to enable them to swiftly manage risks to flood and water level management assets, subject to an agreed code of practice.

Q8. 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.

Disagree.

Other than the beaver population on the River Otter in Devon, all other wild-living populations have, in the main, escaped from licensed enclosures or have resulted from unlawful releases. A Project or Management Plan should be developed for all existing locations with beaver populations, to help understand the longer-term risks, opportunities and necessary management actions. This will allow for longer term monitoring and assessment. Further unplanned and unmanaged releases must not be encouraged, albeit unintentionally. Incentives should be in place to ensure that all future reintroductions are fully compliant with law and best practice, licence conditions for enclosures must be monitored and enforced, and illegal releases must be properly investigated and appropriately enforced/prosecuted to act as a disincentive to others.

Q9. 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.

Disagree.

In our experience, the release of beavers into enclosures cannot be managed as intended. Natural England issued a licence for an enclosure locally, with a number of conditions: that the site must be kept secure; that the licensee must capture and return any escaped beavers; that all beavers must be tagged prior to release, and; that any young must be captured and tagged. Unfortunately, despite the licensee's best efforts, none of these conditions could be met. Beavers have escaped and it has proved impossible to recapture them. The beavers in the enclosure have produced young, which have also been impossible to capture, so it has not been possible to tag them. It is not clear how many beavers are still in the enclosed area, but more escapes are considered likely. Any release into an enclosure must therefore be regarded as effectively a release into the wild, so appropriate assessments must be carried out, and consulted on, for the wider catchment in all cases.

Q10. What criteria do you think should be taken into consideration when determining whether or not to issue an enclosure licence?

The RSIDB is not convinced that captive and controlled management is appropriate. However, as previously stated, any planned enclosure licence must include a full assessment of the wider catchment, as it is most likely that escapes will occur. Appropriate and

enforceable licence conditions must be the first priority when issuing any licence, starting with the need for reliable tagging/traceability of all beavers, including kits. Licensees must accept an element of responsibility for negative impacts, and RMAs should be funded to help manage risks to local flood and water level management assets.

Q11. Does the management hierarchy cover management actions you would expect? Are there additional aspects that you think should be included in the management hierarchy? Please provide further details.

Many lowland river systems are far from natural and are heavily reliant on ongoing management and maintenance, not least to protect their ecological interests. We have experienced beavers burrowing from a high-level system to a low-level system within a SSSI. This resulted in the higher level system being drained to the lower level system, so neither had the correct water levels for a time. We have also been made aware of material from a dam being drawn into a pumping station, which caused substantial and expensive damage. Both of these examples were on Main River and therefore dealt with by the Environment Agency. More recently, beavers have burrowed into the raised embankment of a pumped channel, and whilst this isn't yet a problem, it is probably only a matter of time before the embankment is breached. This is also on Main River, so in this instance will be for the EA to address, but it highlights the need for RMAs to be able to carry out works quickly, without having to first apply for a licence, and they must be properly funded to do this work.

Q12. Excluding direct payment for management activities, what other support do you think should be available and to whom?

The RSIDB supports the intention to create and fund management groups to help manage impacts and provide advice to affected landowners. However, it remains concerned that no clear financial provision appears to have been made for RMAs to help manage future risks.

It is good to see that the Defra acknowledges that low lying arable land is where potential conflicts are likely to be greatest. Furthermore, that those benefitting from beaver activity may not be those who bear the cost. As reintroductions will be for general ecological improvement, and therefore also public benefit, it is considered fair and reasonable for the negative aspects to be funded via public funds. We would therefore welcome the inclusion of payments to landowners as part of the Environmental Land Management Scheme for beaver-friendly management actions. However, it should be acknowledged that many areas are now made up of smallholdings, rather than large estates or farms, so financial support for owners of small landholdings, which may not qualify for ELMS, should also be considered in order to maximise acceptance and support.

All river catchments with a beaver population, either enclosed or wild-living, should have a management group and local beaver officer. There should also be an agreed Project or Management Plan for the relevant area, with an associated plan for the wider catchment in the event of escape.

Q13. Are there any specific areas where guidance is required? Please provide details.

We support the development of a nationally consistent range of management measures and working techniques, with examples of best practice. This should draw on the experience in Scotland and other countries, such as the Netherlands. The risks and available measures for lowland areas will be of particular importance.

Q14. How would you prefer to access advice and guidance (e.g. information on website, via email, focal point for enquiries etc)?

Nationally agreed information on an appropriate website (EA or Beaver Trust) with case studies provided from each beaver group. More detailed local advice can be provided by Steering Groups, which over time as experience of beaver is gained will likely become integrated with existing catchment management groups.

Q15. 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.

No, the RSIDB has no plans to release beavers. However, it is a member of East Kent Beaver Advisory Group and will therefore continue to liaise with and advise interested/affected parties.