

Spains Hall Estate covers 800 hectares in North Essex and comprises 660ha of cropped land, 80 ha of ancient and plantation woodland, and 60 ha of grassland, hedges, ditches, river and beaver created wetland.

We have hosted beavers in an enclosure since March 2019 having released them under licence as part of an [innovative partnership natural flood management project](#) conceived to reduce downstream flood risk to the village of Finchingfield.

Since March 2019 we have shown over **850 visitors** round the project, including policy makers, high level public servants, politicians, farmers, farm advisors, environmental consultants, community groups, local people, schools and voluntary groups.

The project continues to build and currently includes **over a dozen partners**, including researchers, consultants, eNGOs, water companies and technology providers. We utilise volunteer and other ecological surveys, support research programmes by providing subject site access, and contribute [open source data to policy development](#) and [national monitoring programmes](#).



Our project was funded by private contributions (the Estate & CamEO catchment partnership) and public funding (Anglian Eastern Regional Flood Coastal Committee Local Levy).

We do not require this response to be confidential.

National Approach to Reintroductions

(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.

(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.

We would agree with some of the proposals but have selected '**Disagree**' for the following reasons.

Funding

The requirement for wild release projects to secure 5-10 years of management funding at the point of applying for a licence is a significant demand. We feel it is an unrealistic expectation given that most conservation work is led by charitable NGOs or individual landowners who struggle to secure core-funding for such staff-based roles. In addition, many grant funders require all licences to be in place before taking a decision on making a grant. We feel this demand would therefore discourage applications for wild releases, particularly in smaller catchments or projects.

Funding of advice and mitigation in perpetuity.

We believe that the proposals as written, where projects are required to fund advice and mitigation for future release catchments over a 5-10 year period is unlikely to be effective. Such support will have to be made available for landowners, communities and businesses in perpetuity, in both catchments where wild populations currently exist, and future release sites.

The government should centrally fund advice and mitigation for beaver impacts for all locations (current wild populations AND future releases) at whatever scale is appropriate to the local, catchment or regional geography (i.e. it should not be limited to project sites where releases take place).

Failure to do so will lead to a 'postcode lottery' of beaver management support, with varying levels of capacity, funding and statutory authority across the country.

This will lead to inequitable, uncertain and inconsistent support for landowners, businesses and local communities. A situation where those living in catchments with pre-existing wild populations are supported by government-endorsed BMGs, whilst others elsewhere having to rely on charitably funded independent BMGs, is clearly unacceptable. The inevitable outcome of such a patchwork system will be dissatisfaction, ineffective community and land manager support, leaving those impacted negatively by beaver activity with little option but to act independently and without co-ordination.

In our experience the benefits and dis-benefits of beaver activities are frequently felt in different locations. With some businesses and communities benefiting to a greater extent than others. Those

who benefit from beaver activity do not always also have to deal with the dis-benefits, and those who find themselves dealing with dis-benefits are frequently not also able to take advantage of the upsides.

In order to address this inequality we would recommend that the government uses a **Natural Capital valuation approach** to 'value' both the benefits and disbenefits. Values recognised under such a system can then be used to set and facilitate payments to those who find themselves bearing a greater share of the costs. This would not be in the form of compensation as it is a Payment for the ecosystem service value generated by beavers. Such a Payments for Public Goods approach would provide the first tier of 'mitigation' for beaver activity and be consistent with Environmental Land Management and 25 Year Environment Plan principles.

Rewarding land managers (through ELM) and communities, (through General Drainage Charge rebates, Local levy derived grants or council tax rebates, for example), with a natural capital-based valuation would enable overt recognition of the wider societal benefits beavers can bring, create a greater catchment-level connection between upstream and downstream actions, tackle the biodiversity crisis and increase climate resilience.

Subsequent tiers of mitigation would include actions (such as the installation of beaver deceivers, support for tree protection and removal of undesirable structures and problem animals) carried out by centrally funded Beaver Management Officers (through BMGs).

Existing Wild-Living Beaver Populations

(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.

We would agree with some of the proposals but have selected 'Disagree' for the following reasons.

Existing wild populations of beavers should be permitted to remain and be surveyed and managed through a centrally government funded system. Local beaver officers should be employed to provide advice, mitigation and translocation where appropriate. These local beaver officers should be paid for by central government. Local officers should cover an area suitable for the wild beaver population levels (catchment, multiple catchments or regional), and this coverage should be reviewed over time in the light of periodic population surveys.

The government should incorporate a natural capital based valuation of beaver impacts and benefits into national Natural Capital Accounts.

Current and Future Beaver Enclosures

(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.

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

We **disagree** with the proposals for the following reasons.

In our experience the opportunity to reintroduce these animals in a relatively low risk, contained and low conflict environment is a valuable tool to aid understanding, acceptance and facilitate research.

Our 4 hectare enclosure has enabled over 850 people in 3 years to experience an example of a beneficial beaver wetland as it forms, see for themselves the scale and speed of impacts, examine mitigation measures, and learn about wider impacts and benefits (such as flood risk reduction, drought resilience, biodiversity gain and water quality enhancement).

Visitors have included senior public officials, industry representatives, policy makers, experts in flood risk, ecology and hydrology, volunteer groups - their staff, supporters and volunteers, local community groups, farmers, landowners, schools, scout groups and the media. On every occasion visitors have responded positively to the opportunity to get up close to beaver infrastructure, learn first-hand about the opportunities and challenges managing these creatures involves, and ask detailed questions of experienced individuals.

Our experience is that beavers create a great deal of benefit from being permitted to live in Essex and that the likely and actual impacts are easily mitigated. However, we would not have been able to bring this opportunity to the local area without a simple, cost-effective licencing system that enabled beavers to be incorporated as living engineers into our natural flood management project in a low risk, constrained manner that resulted in their activity being focussed in a target area.

We have recorded the following positive impacts:

- **Year round water** present in an otherwise ephemeral surface water system.
- **Attenuation of flood flows**, providing downstream flood risk reduction benefits.
- Increased hydraulic roughness of the sub-catchment where the beavers are present (contributing to **slowing of water flows**)
- **Water quality enhancements** (initial findings) including sediment trapping, nutrient reductions and some pesticide residue reductions.
- **Increased biological diversity** in and around beaver ponds, feeding tracks and within the woodland enclosure as a whole (as recorded by volunteer surveys and Essex Wildlife Trust).
- **Overwhelming public support** an interest in the beavers - resulting in increased local tourism revenue and stimulating wider engagement with nature-based solutions.

Potentially negative impacts we have recorded:

- Some tree felling activity (though this has been easily avoided by protecting specific trees using wire netting or sand paint).
- Localised flooding (behind dams) - however this has also created a valuable wet woodland habitat.

Many of the benefits we have recorded (and continue to record) would have **been impossible to forecast or model with any certainty at the outset of the project**. Whilst the evidence base for beaver impacts and benefits in England is growing rapidly it is not yet possible to model or forecast their specific, local interventions.

Therefore, we feel that to require future enclosed releases to prove benefits at the project inception stage is unreasonable.

However, we would support the requirement for projects to contribute their learning on impacts and benefits, and to be required to commit to sharing experiences generated from licenced enclosures.

We support the assumption that a licenced enclosure does not automatically confer a right to release beavers into the wild at some point in the future.

We would caution against the implication that reducing the number of applications for enclosed releases is desirable, particularly in the short term. In many situations an enclosed release offers a built-in mitigation system, reducing disbenefits, conflict and long term cost that might result from wild beaver releases in some areas. **Enclosures are a valuable tool** in the gradual realisation of nature-based solutions in heavily populated, food producing and infrastructure-rich regions, where moving straight to wild releases are likely to prove far more problematic, such as East Anglia.

Management

(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.

We agree with many of the proposals but would select **NO for the following reasons.**

We would wish to understand exactly what protections beavers would be afforded should they be granted European Protected Species status.

We broadly agree with the management hierarchy set out but we would like to see a management framework adopted paying specific attention to and providing further clarification towards distinguishing between dam function types, shelter function types and when and if to implement translocation and lethal control.

- The management hierarchy should begin with education and community engagement to raise awareness, equip and empower stakeholders to co-exist with beavers.

- The licensing system needs to allow for management activities to be carried promptly out by appropriately trained individuals, including class licensed practitioners, where necessary
- Further stakeholder engagement is needed once a detailed management framework has been produced which shows how the framework will practically operate and how licensing ties in before the framework becomes binding. We believe this should be carried out via a dedicated national stakeholder forum.

We would recommend that the government employs a **Natural Capital valuation approach** to assess both the benefits and disbenefits arising from beaver activity. Values recognised under such a system can then be used to set and offer payments to those who find themselves bearing a greater share of the costs. This would not be in the form of compensation, rather a Payment for the facilitation of a provision of ecosystem service value (to wider society). Such a Payments for Public Goods approach would enable the first tier of 'mitigation' for beaver activity.

Rewarding land managers (through ELM) and communities, (through General Drainage Charges rebates, Local levy derived grants or council tax rebates, for example), with a natural capital-based valuation would enable overt recognition of the wider societal benefits beavers can bring, create a greater catchment-level connection between upstream and downstream actions, tackle the biodiversity crisis and increase climate resilience.

Subsequent tiers of mitigation would include actions (such as the installation of beaver deceivers, support for tree protection and removal of undesirable structures and problem animals) carried out by centrally funded Beaver Management Officers (through BMGs).

By restoring England's beaver population the government would save money from the ecosystem services beavers provide ([Thompson et al, 2021](#)). Even after providing central funding to cover the costs of management at a national level, this would ultimately still be a saving.

Government Policy and Support

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

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

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

We would echo Beaver Trust's Position.

- Mitigation should be reflective of site specific requirements as such a Local Beaver Officer should not be a condition for a licence permitting release of beavers into the wild. Instead Local Beaver Officers or similar roles should be responsible for a catchment, multiple catchments or a designated area which can be employed as required. These roles should be funded directly by the government at a national level rather than by those applying for a licence permitting the release of beavers into the wild. It could even be absorbed into existing infrastructure management organisations, with appropriate expert led training given.
- Detailed information about beavers and their behaviour should be easily accessible on Natural England, as the licencing body, and Defra's web pages, but also made available to eNGOs and other interested parties to include on their own websites in a consistent manner.
- An email address and contact telephone number which members of the public can use to speak to someone about beavers at NE or Defra should also be made available for those who want to raise specific queries or can't access information online.
- A joint approach to funding is required because not all management issues can be resolved by incentivisation and issues will be site specific and beaver population density dependent.

Additional Questions

(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.

We would not consider a wild release application under the proposals as they are set out as we do not feel it would be possible to be successful.

Additionally we feel that the proposals for future enclosed releases would add significant cost, complexity and delay – to the extent that if we were to repeat our current project under such conditions, it is unlikely to have been possible.