

## Response ID ANON-W16X-PHH9-F

Submitted to Consultation on approach to beaver reintroduction and management in England  
Submitted on 2021-11-08 13:49:31

### Introduction

1 Would you like your response to be confidential?

No

If yes, please give your reason:

2 What is your name?

Name:  
Rob Lennox

3 What is your email address?

Email:  
rob.lennox@archaeologists.net

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

Organisation:  
Chartered Institute for Archaeologists (CIfA) & Council for British Archaeology (CBA)

5 Please briefly describe your interest in this consultation.

Please provide your comments in the text box below:

CIfA is the professional body responsible for accrediting archaeologists who work in all parts of the discipline, including those working to provide advice or services to environment systems. CBA is the body which champions the public interest in archaeology which results from knowledge of and engagement with the historic environment. Both organisations are engaged in advocacy to ensure that policy helps to maximise the public benefits that archaeology can bring to the public. We thus have an interest in ensuring that beaver reintroduction adequately considers the historic environment.

### National approach to reintroductions

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.

Agree

Please state your reasons and supporting evidence. If you disagree, please provide any suggested alterations or alternatives and supporting evidence.:

We broadly agree with the proposed approach, however, our advice is limited to ensuring that historic environment provisions are understood. We are pleased to see risks to heritage sites listed a factor for consideration in relation to potential conflicts with beaver reintroduction and would like to ensure that this recognition is appropriately embedded within the system (see our answer to question 7).

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.

Please provide your comments in the text box below:

We would like to stress that the presence of heritage assets (whether designated or non-designated) within a landscape liable to be changed by beaver reintroduction is not necessarily a conflict. Rather, it will be important to understand the historic assets in the landscape in order to know where the physical condition or the wider significance of a heritage asset may be impacted by beaver reintroduction.

We would like to see this impact considered in a thorough way when considering applications for licenses. It will be helpful to ensure that appropriate heritage specialists are consulted within the process, as there are various ways that sensitive heritage assets could be impacted by beavers – not all of which are listed within NEER017 document, and impacts will not always be easy to understand.

For example, the preservation of buried heritage assets with archaeological interest can be impacted by changing water levels, erosion or deposition of sediment, or physical disturbance from burrowing. Upstanding assets like historic buildings, ruined structures, or monuments may be impacted similarly by undermining or erosion. Many of these effects could be exacerbated by changes in flooding extent or frequency.

However, many heritage assets would have been built or used during a time in which beavers existed in these landscapes. It is therefore potentially an opportunity to better reveal the significance of heritage assets.

Liaison between historic environment specialists and ecologists will be necessary to develop mutual understanding of the potential effects of reintroduction.

It seems likely that many reintroduction proposals will be made in places, like Dalby Forest in North Yorkshire, where landscapes have been substantially altered or created 20th Century, or long managed landscapes such as the Forest of Dean or the New Forest. In these places, the reintroduction of beavers could represent simply a new type of management tool.

We would also like to ensure that wider landscape changes are considered as possible impacts that this can have on heritage assets. For instance, landscape character change could have an effect on historic views, or character. It could also affect access to a site, e.g. for recreation.

As well as historic assets located on a reintroduction site, the potential positive and negative impacts on historic assets further downstream will also be important. If beavers act as a natural form of water catchment management, the potential to reduce negative impacts on flood-affected heritage assets will also be important to consider.

It will be important for reintroduction projects to have a broad understanding of expected landscape change. This understanding could be enhanced by consideration of how that landscape has changed over time. For instance, it may be that expected landscape changes may alter the character of the setting of a heritage asset and restore it closer to how it would have been in the past, potentially making a positive contribution to the heritage asset.

### Existing wild-living beaver populations

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.

Agree

Please state your reasons and supporting evidence. If you disagree, please provide any suggested alterations or alternatives and supporting evidence.:

Broadly agree, although note that our expertise is purely in the field of historic environment.

### Current and future beaver enclosures

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.

Agree

Please state your reasons and supporting evidence. If you disagree, please provide any suggested alterations or alternatives and supporting evidence.:

Broadly agree, although note that our expertise is purely in the field of historic environment.

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

Please provide your comments in the text box below:

As in our response above to question 7, we would recommend that understanding heritage assets in and surrounding a potential enclosure should be considered as a part of applications for this type of project.

### Management

11 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.

Yes

Please provide details of any additional aspects you think should be included in the management hierarchy:

While potential impacts of beaver reintroduction on a landscape should be risk assessed at application, with potential impacts identified, we recognise that unanticipated impacts may also arise, and various management methods may need to be considered. Broadly, we support the management hierarchy and actions as articulated in the consultation document. However, for many heritage assets, particularly buried heritage assets with archaeological interest, one management option in the event of risk may be excavation and recording – an action which preserves or enhances significance by creating new information, even if at the cost of physical harm to a site. Although preservation in situ and avoidance of harm is usually considered to be a preferable option, there are cases in which acceptance of harm to a site, offset by excavation and recording may be a suitable option. Similarly, various approaches to managed decline of upstanding assets may be appropriate when weighing the various benefits of conservation actions. As previously stated, there are multiple options that may be appropriate and discussion with historic environment specialists will help to reveal these options.

We would expect these options would be utilised only after options to avoid or mitigate negative impacts were exhausted, however, these options may be preferable to undertaking other measures such as lethal control or translocation of beaver populations.

Investigation which increases understanding of heritage assets may also be an appropriate way to tolerate negative impacts.

## Management

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

Please provide your comments in the text box below:

We do not have any specific comments to make on this section.

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

Please provide your comments in the text box below:

As we have stated in our response to previous questions, liaison between historic environment experts (whether in responsible arm's length bodies or local authorities) will be vital to ensure that both positive and negative impacts on the historic environment are considered. This could be helpfully supported by guidance on the historic environment which will guide managers on potential issues relating to the historic environment and ensure that it is clear when specialist advice is needed.

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

Please provide your comments in the text box below:

We have no specific comments on this section.

## Additional questions

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.

No

If yes, please provide the general location where you might consider applying for such a release.: