



Representing Drainage Water Level & Flood Risk Management Authorities

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Consultation:	Living alongside beavers: a long-term management plan for England		
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Living alongside beavers: a long-term management plan for England

Consultation response by ADA (Association of Drainage Authorities)

About ADA

ADA is the membership organisation for drainage, water level and flood risk management authorities throughout the UK. Today ADA represents over 230 members nationally, including internal drainage boards, regional flood & coastal committees, local authorities and national agencies, as well our associate members who are contractors, consultants and suppliers to the industry.

Our purpose is to champion and campaign for the sustainable delivery of water level management, offering guidance, advice and support to our members across the UK, and informing the public about our members' essential work.

ADA response

ADA has reviewed the draft long-term beaver management plan for England circulated by Defra on 17 August 2026. We recognise that the current draft needs significant revisions in both tone and content to better reflect the hazards of beavers in England's landscape, to create a much more balance and nuanced document that recognises the long-term effects and financial costs of beavers in England, as well any potential benefits.

Summary

In summary, ADA is concerned with:

1. the overtly pro-beaver tone of the document that downplays and/or fails to mention many of the risks and hazards of their presence in England's landscape (more specifically lowlands),
2. the failure to identify clear hazards to public safety, health, and infrastructure specifically in relation to burrowing within, and consequent failure of flood defence embankments,



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3. the document giving little regard to the impact upon:
 - a. flood risk management or lowland water level management and their assets and systems, and embankments.
 - b. productive land or the effects on those businesses,
 - c. environment – specifically to wetland designated sites, dependent on water retention infrastructure, and or the separation of waters of differing quality, nutrient load, or salinity.
 - d. water treatment assets and systems.
4. the lack of a long-term analysis of costs upon public assets and infrastructure and key impacted sectors (e.g. agriculture).
5. not setting out the growing long term funding needs for managing the presence of beavers in the English landscape.

Recognising the hazards

The document frequently promotes opportunities to realise benefits associated with beaver activity, and measures that help people to adapt to their presence. ADA agrees that England should look for opportunities and promote adaptation, but we also need all involved to openly recognise the risks and hazards posed by the presence of beavers, especially to water management infrastructure.

Decisions should not only be informed by local circumstances, conservation objectives, and relevant legal requirements, but by the risks and hazards the presence of beavers pose to people, property, and infrastructure. These should be clearly set out in a dedicated Hazards section of the document.

This also includes environmental risks, such as water loss from artificial and managed feeder systems, particularly in SSSIs, the loss of stored water from embanked wetlands, and ingress of lower-quality water into spring-fed wetlands dependent on high water quality to sustain their assemblage of rare aquatic flora and fauna.

Risks to lowland areas

The plan needs to acknowledge the risks of beaver activity in extensive lowland landscapes (e.g. the Fens or Somerset Levels) where water levels are actively managed.

The main risks include:

1. Increased flood risk from burrowing activities in raised embankments. In some situation this could lead to catastrophic failure of embankments and potential loss of life and serious economic and agricultural impacts.
2. Damage to SSSIs and wetland habitats in terms of loss of water levels, through disruption to water supply or compromised water control structures, or unwanted pollution.



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The plan must recognise the additional resources and costs that will fall on risk management authorities and land managers from monitoring for, and responding to, these impacts.

This will require:

1. Intensive monitoring of many thousands of kilometres of raised embankments.
2. Costly preventative measures to make assets more beaver proof (beaver ready) like bank reinforcement, vegetation management to deter beavers, alternative habitat creation and even reconfiguring embankments to move them further away from wet habitats.
3. Training of system operators to recognise beaver activity and risk indicators and to operate safely to mitigate impacts.
4. Suitable hierarchy of protocols for addressing risks from beaver activity that can be deployed quickly and effectively without reference to external bodies (streamlined licence protocols, similar to the protocols developed by Dutch Water Boards).
5. Assessment of risks to water management within all lowland managed landscapes to beaver proof water management systems, for both licenced released and 'naturally dispersal of beavers. With funding made available to adapt infrastructure and monitor and mitigate any adverse beaver activities.
6. The classification of areas, based on risk assessments of their potential impacts, and the identification of areas where beavers should be actively discouraged due to unacceptable risks from their activities. In such areas, it should be possible to trap and relocate beavers to more suitable areas where their activities are less harmful.
7. Funding made available to achieve the actions listed above.

Managing risk to existing assets and systems

The document places emphasis on preparing for future beaver presence and adaptive management. Whilst this is highly desirable in order to plan ahead and adapt where appropriate, in the case of civil infrastructure this may only be possible during new projects and major refurbishment, but not when it comes to the management of extensive existing assets already within the landscape.

ADA questions the affordability of managing risks through a proactive preventative approach when it comes to flood and water level management infrastructure, assets and systems that are often distributed within the landscape and long and linear in their construction. The section on adaptive management in practice, with regards to protecting vulnerable assets and infrastructure, suggests that these will be a limited and discrete number of specific sites impacted, rather than extensive linear lengths of embankment, watercourse, railway, or canal. The solution to mitigate these risks to infrastructure will likely require an increase in hard engineering solutions that will often be costly and detrimental to the existing riparian habitat.

There is currently insufficient funding for the effective maintenance and management of existing flood risk infrastructure in England, and it is highly unlikely that the Environment Agency will be able to address damage to assets early or undertake preventative works at the scale of the risk beavers pose to such assets and systems. Also, systems such as



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embankments adjacent to watercourses, will need much more frequent monitoring, and the solutions for undertaking such safety checks are at present complex, costly, and labour intensive.

Support for management

The section on 'What support is available' for infrastructure and asset managers, and flood risk and water management authorities, must include practical funded support for urgent intervention where a hazard is posed to human life/health or to a critical asset or system, as well as long term funded support for adaptation. The regulatory system must clearly enable all appropriate interventions and not leave asset managers at risk of prosecution for keeping people and infrastructure safe.

The situation regarding funding is still unclear. Organisations, such as the River Stour IDB, have long tried to promote riverside buffers, which would provide additional habitat and address numerous land management pressures associated with beavers, but these typically fail due to a lack of funding. It is unclear why land managers would agree to the permanent loss of productive agricultural land without any form of payment.

Arms-length standard advice, such as the community of practice being developed on <https://beavermanagement.org/> whilst helpful, can often go to highlight the myriad of environmental regulatory hurdles that need to be crossed. Flood risk activity permits (FRAPs) are a particular issue, given that these have been taking several months to be approved in recent years.

From our members' experience in Kent and looking at impacts in other European nations (e.g. Switzerland, Netherlands, Germany) impacted land managers need actual help – advice and practical assistance. Such approaches effectively funded, can be impactful in reducing conflicts and mitigating risks. In the view of ADA, risk management authorities (EA, IDBs and LLFAs) and Beaver Management Groups (BMGs) need to be adequately funded to provide practical assistance, not just unhelpful arms-length advice.

It is also critically important that BMGs have direct access to flood risk management expertise from risk management authorities, and that this is via trained FCERM officers, and does not entirely rely upon authorities' biodiversity officers who may not have access to information about the FCERM and water management asset and systems at risk.

This does not mean RMAs and BMGs will be able to take on all issues that beavers will present in our lowland landscapes, but it will allow assistance to be more proactive and supportive, especially to smaller businesses and agriculture, homes, and civil infrastructure. This should help to take pressure off of affected landowners, and public infrastructure, and therefore reduce the risk of challenge to further releases.

Beaver releases

The document needs to be much clearer about what is required when it comes to consultation for wild releases. Unauthorised releases need to be investigated and reported as illegal.



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Experience from several licensed enclosures shows that these cannot be kept secure and escaped beavers cannot be recaptured (so effectively are wild releases). In the case of a recent release only consulted and agreed with a single landowner, when of course the beaver population and range will expand freely through a catchment downstream and upstream.

All potentially affected land and asset owners and occupiers must be properly consulted – in the spirit of fairness and transparency. This may not affect the outcome of an application, but it will give everyone the opportunity to share their concerns and opportunities, and may help to develop joint working to resolve future issues.

Terminology: drainage

A more minor point, the term ‘drainage’ used in the document is ambiguous. Does this mean lowland water level management systems and watercourses, under-field and land drainage, surface water drainage, sewerage, SuDS, all of the above or a selection.