

West Surrey Badger Group, Surrey Dormouse Group and Surrey Bat Group views on the Surrey Wildlife Trust's plan for Ash Dieback on their countryside estate.

Context

Ash Dieback (ADB) is a disease of ash trees caused by the fungus *Hymenoscyphus fraxineus* originating in Asia. It appeared first in Eastern Europe in about 1992 and has since moved westward, reaching the UK in 2012. It is now found across the entire UK, including Surrey, where most ash trees are believed to be infected. Ash (*Fraxinus excelsior*) is the third most common tree in England, and is found on most Surrey sites. ADB causes defoliation, crown dieback, and in many cases, leads to the death of the tree.

The questions this raises are

- Will all ash trees become infected? This seems very likely – most are probably already infected.
- Will all ash trees show symptoms? Many will, although not necessarily all, and the severity will vary. Established, mature trees in mixed woodland seem least affected.
- Will all ash trees die? This is uncertain. Across Europe, based on studies over the past 20 years, maximum mortality figures so far for natural woodland (as against plantations) seem to be around 70% (Ref 1).
- How quickly will this happen? Again this is uncertain. It varies according to local conditions, the state and make-up of the woodland and the weather. Given around 30% of trees are still alive after up to 20 years, it won't happen all at once, but trees are already showing symptoms in Surrey. A study in France & Belgium showed that for trees >25cm, annual mortality reached 3.2% after 8-9 years of pathogen presence, while for trees >5cm but <25cm it was ~10%. (6)

The Surrey Wildlife Trust (SWT) plan

The driver for this plan is said to be concern over public safety. Affected trees can become hazardous, losing integrity as the disease takes hold and secondary infections spread. SWT propose to fell all ash trees in a 30m "buffer" zone along roadsides and boundaries, around car parks, and either side of paths, tracks and bridleways (i.e. 30m on each side – 60m in total). The Trust has classified these into high or medium risk areas, but intends to deal with both at the same time and in the same way.

The Trust argues that because all ash trees are believed to be infected with dieback, the individual trees are too dangerous to fell manually and so harvesting vehicles must be used. These are large, heavy (>=25 ton, 3m x 8m) forestry machines that are able to hold, cut and manipulate whole trees, protecting the driver with a steel cage. The trees will be felled and cut into sections which will be collected by a forwarder – another large and heavy vehicle (loaded 31 tons) that picks up the logs and stacks them on a trailer pulled behind it.

The Trust plans to "selectively fell", by which it means all ash trees but no other type of tree, in the buffer zone. Given that most of the woodland is mixed, with ash amongst many other species, including beech, oak, sycamore, hazel, birch, lime, cherry, pine and yew, this will require the 3m wide heavy (>7.5 ton) vehicles to weave in between the non-target trees to access the ash.

The logs will be removed from site but the brash will be left lying where it falls. The Trust originally planned to work on four sites between November and March of 2018-19: Norbury Park, Shepleas, Shere Woodlands and Staffhurst Wood.

Our concerns

The Forestry Commission (FC) guidance on Ash Dieback management (2) says: *Trees in areas with high levels of public access or other recreational use need to be monitored carefully for risks to safety, and some felling or pruning of dead or dying trees is advisable if risk assessments show*

they are a hazard. Note “some felling” and “if risk assessments show they are a hazard” – i.e. assessment of individual trees. The Trust is not assessing individual trees but instead felling **all** ash in the buffer zones.

All four sites are Sites of Special Scientific Interest (SSSI) and include areas of ancient woodland, three are part of the Surrey Hills AONB, and Norbury is also a Special Area of Conservation. As such, they are recognised officially as ecologically valuable habitats with statutory protection and are sensitive to disturbance.

We only had sight of one ecological survey – that of Norbury Park. This was incomplete as no survey had been done for dormice or bats, which are European protected species that are declining in numbers nationally and are known to be found on site. These species are protected under the Habitats Directive so that it is an offence to capture, injure, damage or disturb them, or damage or destroy their breeding or resting places.

Dormice and bats hibernate between November and March; dormice on the woodland floor, and some bats in trees. From March to October both are active, with bats roosting and dormice nesting in holes/crevices/hollows in trees. This means there is a risk of disturbance, harm and death for these species, and that their resting and breeding places are very likely to be destroyed or damaged, if the work goes ahead.

The proposal to use heavy machinery is of particular concern as not only would any hibernating dormice in its path be crushed, but such vehicles are known to cause compaction of woodland soils which creates long term and effectively irreversible damage (4,5). Natural England and the FC guidance for dealing with Ash Dieback on SSSIs (3) states *Very heavy thinning and salvage operations to remove dying trees have been shown to accelerate the disease.*

The decision to create a 30m buffer zone where all ash is removed is not based on any evidence that this is essential for public safety and appears excessive. It allows for the extraction of more timber, which may be commercially desirable, but is not necessary, and increases any negative impact on the woodland and wildlife. It also goes against the FC and NE guidance (Ref 3) which says: *It's worth keeping as much of the current population of ash trees as possible to maintain a diverse genetic resource, and identify and retain those trees (and any of their progeny) showing the highest levels of disease tolerance.* FC guidance (2) suggests that where trees are managed for “environmental benefits” – which one would assume would apply to SWT managed sites - *it may also be appropriate to plan to retain ash as a component for as long as possible to provide habitat for those species dependent on ash trees, and allow time for tolerant species to be identified.*

On Norbury some of the buffer zones are along internal fenced boundaries. The reason given for removing ash here is that the fence line may be damaged should a tree or branch fall, and livestock could escape. In a number of areas the boundary is between one field and another, with a narrow strip of woodland (a shaw) between them. The existing fences are in poor condition and clearly not well maintained, so livestock could probably already get through if they were determined. Furthermore, they would only be moving from one field or tenant farm to another, rather than into danger such as a road or outside the site. It is not clear that this represents a public safety issue such that felling can be justified. Up to now this issue has always been dealt with as and when it happens and there seems no reason that this cannot continue.

Our Recommendations

In summary:

1. Treat Medium Risk areas as recommended by FC and NE: “*Trees in areas with high levels of public access or other recreational use **need to be monitored carefully** for risks to safety, and some felling or pruning of dead or dying trees is advisable if risk assessments show they are a hazard.*” i.e. fell only trees identified as hazardous.
2. Tackle the High Risk areas first (e.g. along rail lines, main roads and car parks).
3. Treat internal boundaries according to existing procedures (i.e. as and when removal of problem trees).

4. Reduce the buffer zone to as far as the harvester can reach (8 -10m) and restrict the heavy vehicles to paths, tracks and roads. This will allow the harvester to reach the ash trees in the buffer zone while minimising compaction and damage to other tree species.
5. Postpone the work at Norbury, Sheepheas, Shere and Staffhurst to allow time for a full survey for European Protected Species at all four sites so that appropriate procedures and mitigation can be prepared **before** commencing work.

SWT faces the prospect of a continual demand upon its resources over the next 20 years as larger numbers of trees than would have previously been expected require safety work. This is something that is outside the Trust's control and for which they would struggle to have prepared. It is understandable that an opportunity to deal with it quickly and decisively, at minimal cost, as presented by Euroforest (the contractor), would be seized upon. We believe, however, that SWT has responsibilities to the wildlife of these sites that mean this proposal needs to be reconsidered. It is clear to us that creating 60m swathes, using heavy machinery, along all paths will have a significant negative impact on the wildlife and ecology of these sensitive and special places. This cannot be justified by a serious wildlife conservation organisation which has obligations to the existing and future inhabitants of Surrey to preserve and cherish these sites, and the wildlife within them. We urge the Trust to accept our suggestions as a compromise that will allow public safety risks to be addressed while securing the habitat in the best possible condition under the circumstances.

As a final comment, it should be noted that the SWT response to ADB, with its likely drastic effect on the woodland environment through loss of structure and a key ecosystem species, has been entirely focused on public safety. No apparent thought has been given to how to manage the woodlands for which SWT is responsible to better allow them to cope with this change. The Trust should be devoting some of its time, expertise and resources to address how to adapt management practices and what new ones to adopt to counter the loss of woodland conditions and help preserve ecosystem integrity. Although Ash Dieback is the immediate problem, climate change will become increasingly significant, and there are a number of new pests and diseases spreading across Europe that will impact upon our woodlands. The Trust should be working on plans that will help to ensure habitat continuity, and focusing efforts on how to make ecosystems more robust, species diverse and resilient to meet these challenges.

References:

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4. Beat Frey , Johann Kremer, Andreas Rudt, Stephane Sciacca, Dietmar Matthies, Peter Luscher, *European Journal of Soil Biology*,45 (2009) 312–320.
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