

## **Planning Inspectorate Appeal – Reference CROW/5/M/04/2488 – Waterdale, South of Road**

The East Yorkshire and Derwent Ramblers' Association (EY&D RA) disagree with the appellants Grounds of Appeal and make the following comments.

1. 'The vegetation cover indicates that less than 50% of the area can be classified as down'.

The evidence supplied by Dr Mark McLellan and enclosed with the Halifax Estates Management Company Appeal states that this area has 40% unimproved calcareous grassland and about 50% semi-improved grassland. Part of the semi-improved grassland has been classified as calcareous, part neutral and part poor semi-improved.

The information supplied previously by EY&D RA (see submission no 18A,B and C) does not agree with this. It indicates that this area is unimproved calcareous grassland. The Phase II Habitat Survey shows that this area is unimproved calcareous grassland with 13 calcicolous indicator species occurring. The Phase I Habitat Survey and the SSSI citation also support the classification of unimproved calcareous grassland in this part of the dale.

During his visit to the site in January 2004 Dr McLellan records tor grass (*Brachypodium pinnatum*) which is often dominant on calcareous soils and a number of other calcicolous species in the semi-improved grassland. It is highly likely that other calcicolous species are present but because of the time of year when the visit to the site was made a number of them will have been missed. Grasslands are difficult to study because many of the species can only be identified in early summer. At certain times of the year calcareous grassland can take on the appearance of neutral grassland. The mosses *Calliergon cuspidatum* and *Pseudoscleropodium purum* are also mentioned in Dr McLellan's report. Both these mosses are found in chalk grassland, *P. purum* is the most abundant of the chalk grassland mosses.

We therefore disagree with Dr McLellan's classification of semi improved neutral grassland. We believe it is unimproved calcareous grassland.

2. 'The land parcel is not of an open character, being a steep sided area surrounded by arable land'.

The description of Down as applied to the Yorkshire Wolds is, 'generally within an open landscape and whilst individual land parcels might comprise enclosures of varying size, they will be part of a typical chalk landscape sometimes with open vistas across undulating countryside and sometimes comprising steep-sided scarp slopes and dry valleys with more limited views.'

The area complies with this description and is part of a steep-sided dale typical of the Yorkshire Wolds.

We believe that the information we have provided previously and the additional information supplied by Dr McLellan indicates that this area fulfils the downland criteria and is correctly mapped as open country on the provisional map.