

Planning Inspectorate Appeal – Reference CROW/5/M/04/2490 – Brown Moor Dale

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 information supplied previously by EY&D RA (see submission no 17E) does not agree with this. It indicates that this area is predominantly unimproved calcareous grassland. The Phase I Habitat Survey supports this as does the BioDAT report.

During his visit to the site in January 2004 Dr McLellan records areas of semi-improved calcareous grassland and areas of semi-improved neutral grassland with only 4% as unimproved calcareous grassland.

Dr McLellan mentions tor grass (*Brachypodium pinnatum*) and also indicates that there are chalk indicator species present in some of the semi-improved grassland. Mosses *Pseudoscleropodium purum*, *Calliergon cuspidatum* and *Rhytidiadelphus squarrosus* are mentioned. All occur in chalk grassland with *P. purum* being the most abundant of the chalk grassland mosses.

Grasslands are difficult to classify 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 also, north facing slopes usually have fewer calcicolous species.

Dr McLellan visited the site in January 2004 and it is highly likely that calcicolous species were present in the area he has classified as semi-improved neutral grassland but because of the time of year when the visit was made they have been missed. Dr McLellan believes that the use of fertilizers will have resulted in the dominance of grasses such as tor grass. It is more likely that a reduction in grazing pressure is responsible for their increase.

We therefore disagree with Dr McLellan's classification of semi improved neutral and semi-improved calcareous 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 should remain as open country on the provisional map.