

Badenoch & Strathspey Conservation Group  
**STATEMENT OF EVIDENCE**  
**Hearing Session**

**Provision of the Local Plan**

**Policy 24 Housing developments outside settlements**

**Summary of objection(s)**

c) Needs to be qualified, given that it is established that brownfield sites can have high biodiversity value (often particularly for invertebrates). Examples in the NP include quarries/gravel pits and old railway lines.

Also brownfield sites can have special heritage value and this should be recognised in the Policy.

The wording in this policy appears to reflect a lack of understanding that a rural brownfield site can be a fantastic area, rich in biodiversity, and excellent for amenity. Such rural brownfield sites are likely to already be served by tracks that are now used for recreation; to put a development there effectively means traffic on the track, which reduces quality of amenity/recreational experience.

Alterations will need to be fully reflected in 5.70.

If the CNPA do not specifically include the recommended sentence, we are concerned that the CNPA will not think to seek a survey on a brownfield site before determining an application.

**Recommendation.**

Include in relation to brownfield sites 'where recent survey has demonstrated that there is no special biodiversity interest'.