

Greenspace Information for Greater London CIC

GiGL is London's environmental records centre. We mobilise, curate and share data that underpin our knowledge of London's natural environment, enabling our stakeholders to make informed decisions in policy and practice.

www.gigl.org.uk



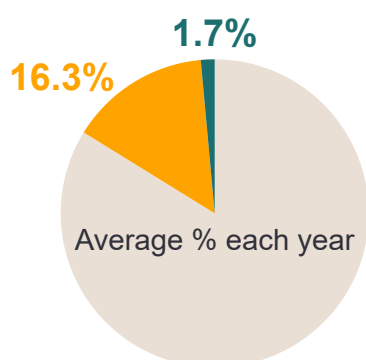
The London Plan is a vital framework for guiding sustainable growth and ensuring development delivers positive outcomes for London's communities and the environment.

The Draft London Plan (2026) rightly recognises the importance of nature recovery, climate resilience and access to green space. However, several proposed policies risk weakening the role of ecological evidence in planning decisions and could undermine the effective delivery of the Plan's environmental ambitions.

To ensure planning decisions are informed by the best available evidence and support London's long-term nature recovery goals, **GiGL is calling for the following amendments**. We would appreciate our stakeholders considering reflecting these points and advocating for GiGL in their own consultation responses.

1 A requirement that planning decisions be informed by the best available and most up-to-date ecological evidence

The current Policy G6 (2021) requirement has not translated effectively into practice, so should be strengthened in the new Plan in sections **GHR6** and **GHR7**:



● Are being informed

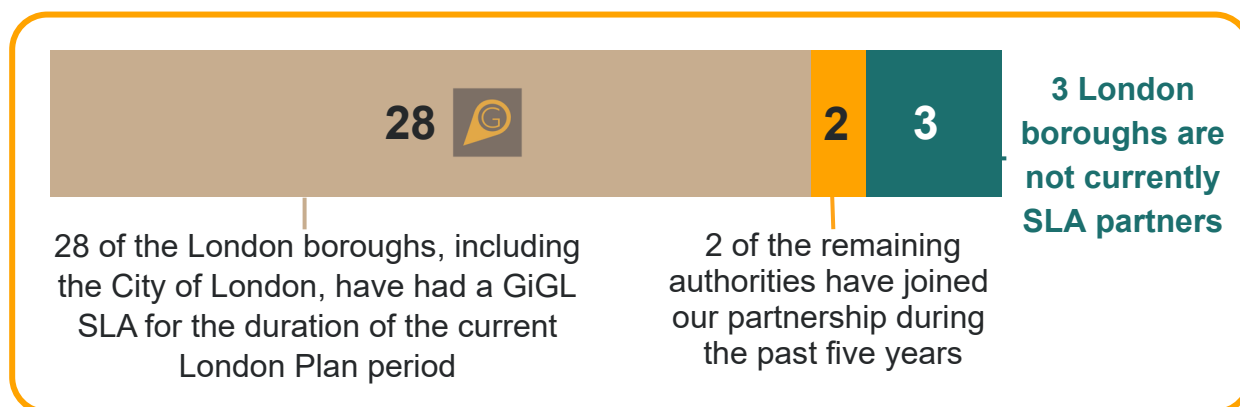
● Should be informed

**Equivalent to
48,000 applications
since 2021**

LERC data and services are a key component of the ecological evidence base, yet **our data searches currently inform only around 1.7% of planning applications** in Greater London – the lowest rate of LERC data use in planning of any region in England

On the basis that about 18% of applications should be informed by a GiGL data search, **more than 48,000 applications may have progressed without the necessary ecological evidence being considered** over the lifespan of the current London Plan

Local Planning Authorities have a duty to have due regard to nature and should be consulting GiGL's evidence in their planning decisions:



Strengthening these requirements would help ensure that biodiversity is considered at the earliest stages of planning, improve the quality of ecological assessments, and help prevent the loss or inappropriate management of sites and species that are already recognised as important to London.

2 A stronger requirement to consult the underlying evidence base that informed London's LNRS and LGIF

The new Policy GHR6 risks weakening the position of ecological evidence in planning by placing significant emphasis on the LNRS and LGIF. Both are important strategic resources, but they represent strategic snapshots and are not designed to replace detailed evidence, which is **constantly evolving**. Because formal strategy updates take years, there is a danger that the planning system will not take into due consideration newly reported species, priority habitats and designated sites.

GiGL is the sole custodian of many of the datasets which form the most up-to-date evidence base.



Natural England has specifically clarified that LNRS content will not substitute for LERC data in their guidance note for Responsible Authorities.

Nor do the LGIF and LNRS recognise all important biodiversity in a local context.



There are

115 species



on the London Species of Conservation Concern list which are **not** highlighted in the LNRS

3

Increased consideration of nature outside of protected areas within development management

Important biodiversity exists throughout London, not only within designated sites. It is important that protection is afforded to all priority species and habitats in the development management process, not only designated SINC's and the features for which they are designated, which are currently afforded protection through Policy GHR6 D. **GHR6 A(6)** leaves species and priority habitats outside the network to variable local plans, creating a potential enforcement loophole. This could put important biodiversity outside of these areas at risk.

Of the total area of priority habitats in our database

15%



sit **outside** of the SINC network

It is important that the complete evidence-base is accessed when developing Local Plans and Local Nature Recovery Action Plans.

A substantial proportion of legally protected species records occur outside the SINC network:

Records in our database recorded **beyond** SINC boundaries:

14%

of species records with UK legal designations



28%

of species records with EU legal designations

4 Recognise the significant threat posed by invasive non-native species

Invasive non-native species represent one of the most significant drivers of biodiversity decline and can undermine habitat creation, ecological restoration and Biodiversity Net Gain outcomes. Their omission from the draft Plan sections **GHR6** or **GHR9** represents a missed opportunity to support effective long-term environmental management.



Greater London has nearly
223,000 records
of invasive non-native species



5 Require ecological survey data, habitat assessments, Biodiversity Net Gain monitoring data and other environmental information generated through the planning process to be submitted to the relevant Local Environmental Record Centre

This would ensure that decisions are informed by an increasingly robust evidence base, improve future planning outcomes, and support monitoring of London-wide environmental objectives. The generated data would also be used to inform the next iteration of London's LNRS.

Less than 0.02%

of the records in our species
database have been shared from
the planning process

