



02 July 2026

Foss House
Kings Pool
1-2 Peasholme Green
York
YO1 7PX

Mr A Gilruth
agilruth@moorlandassociation.org

Dear Mr Gilruth

Access to Information Request – Internal Review - IR2026/05774

Thank you for your email dated 05 May 2026, asking for an internal review of Natural England's handling of your request for information, EIR2026/02139 under the Environmental Information Regulations 2004 (the EIRs).

Process

In accordance with Natural England's internal review procedures, your request has been reviewed by a senior officer who was not involved in the original decision and in discussion with colleagues who handled your original request. Your points for review have been considered as well as the public interest arguments for and against disclosure.

Original Request

Your original request dated 20 February 2026 can be found in Annex B.

Natural England's original Response

The original response dated 5 May 2026 is in Annex C.

Points for Review

Within your original request, for requests 1 and 2, you requested specific records relating to publication approval / workflow / QA / peer review processes. We responded by stating that the specific documents requested did not exist in the format requested. To be helpful, we set out in several tables, details showing the publication identifier and title, key workflow dates, approving roles, recorded assurance requirements, and details of how publication approval was obtained. For request 3 (requesting one recorded item showing the governance route), we provided tabular details of four signoff documents held and also provided those four documents, subject to redactions under Regulation 12(3) Personal information.

For request 4 we provided a list of RP2967 document versions as requested.

In your internal review request email of 5 May 2026, you have suggested that our response appeared incomplete and have requested copies of various listed documents from our original response. On review of our original response, we can confirm that it was not incomplete. We fully responded to your requests providing lists of documents and additional detail held within the scope of your requests.

In your internal review request, you have requested the following additional documents:

1. The two completed QA Review Forms, namely:
 - QA Review Form – Upland Habitats Senior Specialist
 - QA Review Form – Principal Adviser for Biodiversity Delivery

2. The specialist comments referred to in the response as:
 - Comments on the draft Definition of Favourable Conservation Status for Blanket bog– Senior Specialist (Wetlands)
 - Any other specialist comments relied upon as evidence of QA/review completion
4. The publication/workflow records referred to in the response, including:
 - Publication Submission Form/email record dated 19 February 2025
 - Publications review record dated 20 February 2025
 - Publications workflow record showing final amendments on 27 March 2025
 - Publications system record showing upload/publication on 31 March 2025

Natural England is withholding the above documents under the following exceptions of the EIRs.

- Regulation 12(4)(e) Internal Communications
- Regulation 12(4)(d) Material which is still in the course of completion, to unfinished documents or to incomplete data

Please refer to Annex A below for further details of these exceptions.

Point 3 of your internal review request you asked for:

“3. Any response-to-reviewer table, comment-resolution table, tracked-comments close-out note, or equivalent record showing how final pre-publication review comments were addressed.”

In our original response we indicated that there was no single document that was in scope of your request. We provided a table detailing the process (table titled ‘Recorded review and sign off’). In our view this fully answered your request.

Point 5 of your internal review request you asked for:

5. **The governance records referred to in the response, including:**
 - The 13 December 2017 Technical Steering Group (TSG) meeting note extract
 - The 6 April 2022 circulation of the revised definition document to TSG
 - Any TSG responses or comments on that circulation
 - Any record showing how those comments were addressed
 - Any record confirming that the revised favourable values did not require renewed TSG discussion or formal re-approval.

On review of our original response, we can confirm that we only hold the document dated 13 December 2017 (first bullet above) and another document (dated 5 July 2022) referring to the 6 April 2022 circulation (second bullet above). The 5 July document (an email from the project manager to the Chair of the TSG) confirmed that all previous comments had been addressed. We do not hold any further documentation relevant to this request other than those listed in the original response. Therefore, EIR Regulation 12(4)(a) Information not held, applies.

Regarding your additional request point 6:

6. *“Any record explaining whether changes made after technical sign-off, including final wording amendments in March 2025, required further QA, technical assurance, TSG review, or other governance clearance.”*

Natural England holds a later draft version of the Blanket bog definition document from 11 Oct 2024, however we are withholding this document under the following exceptions of the EIRs.

- Regulation 12(4)(e) Internal Communications
- Regulation 12(4)(d) Material which is still in the course of completion, to unfinished documents or to incomplete data

Please refer to Annex A below for further details of these exceptions.

Conclusion and Decision

An internal review of your information request has been completed. It has found that Natural England processed your original request in full compliance with its obligations under the Regulations and responded to each of your requests providing details and documents where appropriate. Your internal

review request asked for additional specific documents and we subsequently applied three exceptions under the Regulations in relation to those documents: Regulation 12(4)(a) Information not held; Regulation 12(4)(d) Material in the course of completion, and Regulation 12(4)(e) Internal communication.

If you remain dissatisfied following this review, you may apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: <https://ico.org.uk/global/contact-us/> or call on 0303 123 1113 (local rate), www.ico.org.uk.

Yours sincerely



Legal and Governance
Natural England

Enc.

Annex A

Regulation 12(4)(e) Internal Communications

Regulation 12(4)(e) states: “...a public authority may refuse to disclose information to the extent that (e) the request involves the disclosure of internal communications.”

Any disclosure made under the Regulations is in effect a disclosure to the world at large, as any other applicant would be entitled to the same information on request. As such we take this into consideration when making any decisions as to whether it is in the public interest to disclose or withhold requested information.

The Information Commissioner's Office guidance makes it clear that this exemption is intended to allow public bodies to 'think in private' so as to exempt from disclosure information which may not yet represent the settled view of a public body. This provides protection for the “private thinking space” of senior officials and also prevents disclosure of information or advice provided by more junior officials which might be taken to represent an official view of a public body.

We are using this exception in relation to internal emails and comments on draft documents between officers of Natural England in relation to RP2967 Blanket Bog.

We have considered whether it is in the public interest to disclose the information covered by this exception, as is required by the Regulations. Factors favouring release include the public interest in all environmental information; promoting accountability and transparency by Natural England for the decisions it takes; promoting accountability and transparency in the spending of public money; allowing individuals access to information that helps them understand the reasons why actions were taken by public bodies that affect them and furthering the understanding of and participating in the public debate of issues of the day.

On balance it is our view that it would not be in the public interest to disclose this information. Natural England is entitled to enter into internal discussions and ask advice regarding matters free from any external pressures which may inhibit those discussions and any advice offered.

This “private thinking space” is often necessary for officers to deliberate matters and consider options on matters where a decision or resolution is still to be reached. It is in the public interest that any options being considered can be finalised by officers without the threat that these options and their details might enter the public domain. To do so may adversely affect any action taken which ensues from a decision made which subsequently results from following this advice.

Regulation 12(4)(d) Material which is still in the course of completion, to unfinished documents or to incomplete data

Regulation 12(4)(d) states that – “a public authority may refuse to disclose information to the extent that its disclosure would adversely affect Material in the course of completion, unfinished documents and incomplete data”.

Whilst Natural England believes in openness and transparency, as a public body, Natural England has a duty to ensure that the data it releases is accurate and not misleading. In view of this we have decided not to disclose these documents.

In applying this exception, we have had to balance the public interest in withholding the information against the public interest in disclosure.

Any disclosure made under the Regulations is, in effect, a disclosure to the world at large, as any other applicant would be entitled to the same information on request. As such, we consider this when deciding whether it is in the public interest to disclose or withhold requested information.

Natural England considers that releasing the information may lead to confusion regarding Natural England's official position and addressing ensuing inquiries would not be a productive use of public resources. We feel there is little public interest in releasing these documents.

Annex B

From: Andrew Gilruth agilruth@moorlandassociation.org

Sent: 20 February 2026 18:22

To: SM-NE-FOI (NE) foi@naturalengland.org.uk

Subject: FoI request

Dear Natural England

Please treat this as a request for information under the Freedom of Information Act 2000.

I am seeking a small, clearly bounded set of process / governance / QA “audit trail” records for the production and publication of:

Natural England Research Report RP2967 – “Definition of Favourable Conservation Status for Blanket bog” (and/or the internal project/publication record that corresponds to this published report).

To keep this request within the appropriate cost limit, I am not asking for all emails, all drafts, or underlying datasets at this stage. I am requesting only the specific records listed below (or their nearest equivalents).

For each item, if the specific record is not held, please confirm explicitly that it is not held for RP2967 and identify the substitute record (if any) that is used instead.

1) Publication approval / workflow record (single record extract)

Please provide the publication approval and sign-off record for RP2967 from the system used to manage technical publications (often described as a “technical publications database” or equivalent internal publication workflow), showing the following fields (or equivalent):

- publication/report identifier (eg. RP2967) and title
- dates for: submission, review, approval, and publication/release
- approving officer(s) role/title (names acceptable if already recorded; if not, role/title is sufficient)
- any recorded QA category / QA level / evidence assurance level or similar classification assigned to the publication
- any recorded notes indicating required review steps (eg. peer review, specialist sign-off)

If the publication/workflow record does not itself contain QA/evidence assurance fields, please also provide the document or record referenced by the workflow as evidence of QA completion (eg. a linked checklist, gateway note, sign-off memo, or attached review record), limited to the minimum needed to evidence completion.

You may redact or omit unrelated fields provided the above information is included.

2) QA / peer review completion record

Please provide the completed QA / peer review checklist or form (or equivalent record) used to confirm that RP2967 met Natural England’s internal evidence/quality standards prior to publication.

If there is no single checklist/form, please provide the closest equivalent QA completion record (e.g., internal approval memo, QA sign-off note, or governance gateway document) that confirms QA/review was completed.

In addition, please provide any response-to-reviewer table (or equivalent close-out document) used to address review comments for the final pre-publication review round only (i.e., the last round before publication). If none exists, please confirm it is not held.

3) Governance / oversight record

Please provide one recorded item (minute extract, decision log entry, approval note, or email) that shows the governance route used for RP2967, specifically:

- whether a Technical Steering Group (TSG) or other governance group oversaw/endorsed the DFCS definition for blanket bog; and
- the date of that oversight/endorsement (or, if none occurred, a record stating that no TSG/governance review was required or was undertaken).

If the relevant governance body is not called “TSG”, please provide the equivalent record for the body that fulfilled that function.

4) Version list

Please provide a list of document versions held by Natural England for RP2967 (metadata only), limited to:

- filename (or document title)
- date created and/or last modified
- document status (draft/final) if recorded
- author/owner job title/team if recorded (names not required)

This is requested as a list only; I am not requesting copies of drafts at this stage.

Scope and practicalities

- Time period: from the start of drafting/commissioning of RP2967 up to the publication date.
- Search locations: limited to the publication/workflow record and the RP2967 project folder / record set (or equivalent).
- If you consider that any part of this request would exceed the appropriate limit, please supply the remainder and provide advice and assistance under section 16 identifying the narrowest refinement that would bring the outstanding part(s) within the limit.
-

If you consider information exempt

Please cite the specific exemption(s) relied upon and release all reasonably separable non-exempt information.

Annex C

05 May 2026



Foss House
Kings pool
1-2 Peasholme
Green
York
YO1 7PX

Andrew Gilruth
agilruth@moorlandassociation.org

Dear Andrew Gilruth

Access to information – Request No EIR2026/02139

Thank you for your request for the information which we received on 20 February 2026 and for which an extension was applied on 19 March 2026.

Your request has been considered under the Environmental Information Regulations 2004 (**the EIRs**). We apologise for providing this response past the deadline.

You asked for the following information (text in bold below). Please find below our response to each of your questions below.

I am seeking a small, clearly bounded set of process / governance / QA "audit trail" records for the production and publication of: *Natural England Research Report RP2967 - "Definition of Favourable Conservation Status for Blanket bog"* (and/or the internal project/publication record that corresponds to this published report).

To keep this request within the appropriate cost limit, I am not asking for all emails, all drafts, or underlying datasets at this stage. I am requesting only the specific records listed below (or their nearest equivalents).

1) Publication approval / workflow record (single record extract)

Please provide the publication approval and sign-off record for RP2967 from the system used to manage technical publications (often described as a "*technical publications database*" or equivalent internal publication workflow), showing the following fields (or equivalent):

- * publication/report identifier (eg. RP2967) and title.**
- * dates for: submission, review, approval, and publication/release.**
- * approving officer(s) role/title (names acceptable if already recorded; if not, role/title is sufficient).**
- * any recorded QA category / QA level / evidence assurance level or similar classification assigned to the publication.**

- * any recorded notes indicating required review steps (eg. peer review, specialist sign-off).

If the publication/workflow record does not itself contain QA/evidence assurance fields, please also provide the document or record referenced by the workflow as evidence of QA completion (eg. a linked checklist, gateway note, sign-off memo, or attached review record), limited to the minimum needed to evidence completion.

2) QA / peer review completion record

Please provide the completed QA / peer review checklist or form (or equivalent record) used to confirm that RP2967 met Natural England's internal evidence/quality standards prior to publication.

If there is no single checklist/form, please provide the closest equivalent QA completion record (e.g., internal approval memo, QA sign-off note, or governance gateway document) that confirms QA/review was completed.

In addition, please provide any response-to-reviewer table (or equivalent close-out document) used to address review comments for the final pre-publication review round only (i.e., the last round before publication). If none exists, please confirm it is not held.

3) Governance / oversight record

Please provide one recorded item (minute extract, decision log entry, approval note, or email) that shows the governance route used for RP2967, specifically:

- * whether a Technical Steering Group (TSG) or other governance group oversaw/endorsed the DFCS definition for blanket bog; and
- * the date of that oversight/endorsement (or, if none occurred, a record stating that no TSG/governance review was required or was undertaken).

If the relevant governance body is not called "TSG", please provide the equivalent record for the body that fulfilled that function.

4) Version list

Please provide a list of document versions held by Natural England for RP2967 (metadata only), limited to:

- * filename (or document title).
- * date created and/or last modified.
- * document status (draft/final) if recorded.
- * author/owner job title/team if recorded (names not required).

Scope and practicalities

- * Time period: from the start of drafting/commissioning of RP2967 up to the publication date.
- * Search locations: limited to the publication/workflow record and the RP2967 project folder / record set (or equivalent).
- * If you consider that any part of this request would exceed the appropriate limit, This is

requested as a list only; I am not requesting copies of drafts at this stage.

Our response:

Natural England holds information relating to the development, assurance, governance, and publication of RP2967 (*Definition of Favourable Conservation Status for Blanket Bog*). The

information relevant to Questions 1, 2, 3 and 4 is not held within a single system or document.

Question 1 & 2

Q1 Publication approval/workflow record for RP2967

Please refer to the tables below, which set out the publication identifier and title, key workflow dates, approving roles, recorded assurance requirements, and details of how publication approval was obtained.

Q2 QA/peer review completion record for RP2967

Please refer to the tables below. There is no single completed QA or peer-review checklist covering all assurance stages for RP2967. Evidence of QA and review completion is provided as set out in the tables.

Publication/report identifier and title	
Information held – Title of Report	Date
RP2967 – <i>Definition of Favourable Conservation Status for Blanket Bog</i>	31 March 2025

Publication workflow dates (as recorded)			
Stage	Summary of information held	Record source (reference only)	Date
Submission	Definition submitted by Favourable Conservation Status (FCS) team to Publications for processing.	Publication Submission Form (email record).	19 February 2025
Review	Publications review undertaken; minor amendments requested.	Publications review record (email record).	20 February 2025
Review (final amendments)	Final wording amendments incorporated.	Publications workflow record.	27 March 2025
Approval	Agreement to publish confirmed following completion of assurance steps.	Senior Approval confirmations (email records).	21 March 2025
Publication/Report release	Document uploaded to Access to Evidence and published.	Publications system record.	31 March 2025

Approving officers (roles as recorded)	
Approval	Job Title/Role
Technical	Principal Specialist (Technical Steering Group (TSG))
Publications	Director of Evidence
Project Level	Principal Officer and Senior Responsible Owner (SRO) (Strategic Risk & Communications)
Portfolio Level	Director for Strategy and RLS Portfolio Board
NExCo Level	Natural England Executive Committee (CEO and relevant Directors)

QA/Evidence Assurance Clarification
Summary of information held
Project Level Technical Assurance applied. Two QA Review forms completed. Additional specialist comments provided directly on the draft definition record.

Recorded review and sign off		
Review/sign off	Summary of information held	Date
Specialist QA	QA Review Form – Upland Habitats Senior Specialist	
Specialist QA	QA Review Form – Principal Adviser for Biodiversity Delivery	
Specialist Comments	Comments with draft definition – Senior Specialist (Wetlands).	
TSG sign off (Round 1)	TSG meeting notes.	13 December 2017

Question 3

Governance/oversight record for RP2967

Please refer to the tables below. This information shows a recorded item evidencing the governance route used for RP2967 (*Definition of Favourable Conservation Status for Blanket Bog*).

	Summary of information held	Record source	Date
Technical Steering Group (TSG) Chair sign off (round 2)	Record confirming TSG Chair approval following completion of required amendments representing formal technical governance endorsement of the Definition of Favourable Conservation Status definition.	TSG Chair sign off confirmation.	05 July 2022
Publications sign off	Director for Evidence confirmation		20 May 2023
Executive sign off	CEO confirmation		20 March 2025
Executive Committee confirmation	NExCo approval confirmation		27 March 2025

Question 4

Version List

The table below sets out the document versions held by Natural England for RP2967.

Document Titles	Date
RP2967 Definition of Favourable Conservation Status for Blanket bog final.docx	08 April 2025
RP2967 Definition of Favourable Conservation Status for Blanket bog.pdf	08 April 2025
RP2967 Definition of Favourable Conservation Status for Blanket bog.pdf	26 March 2025
RP2967 Definition of Favourable Conservation Status for Blanket bog V4.0.docx	27 February 2025
RP2967 Definition of Favourable Conservation Status for Blanket bog V3.0 AUDIT TRAIL ONLY.docx	31 January 2025
RP2967 Definition of Favourable Conservation Status for Blanket bog V3.0 DO NOT USE.docx	30 January 2025
RP2967 Definition of Favourable Conservation Status for Blanket bog For Final sign off OUT OF DATE JAN 2023.docx	13 December 2024
Draft England FCS statement_blanket bog_v0.10.DOCX	05 June 2023
Blanket bog_England FCS definition_v2.0.DOCX (shows version control up to	05 July 2022

when deemed complete)	
Draft England FCS definition_blanket bog_v0.11_clean.DOCX	05 August 2020
Draft England FCS statement_blanket bog_v0.11.DOCX	09 July 2018
Draft England FCS statement_blanket bog_v0.9.DOCX	08 December 2017
Blanket bog_England FCS statement_v0.8.DOCX	07 February 2017
Blanket bog_England FCS statement_v0.7_RJP.DOCX	31 January 2017
Draft England FCS statement_blanket bog_V0.5.DOCX	25 February 2016
Draft England FCS statement_blanket bog_V0.5_1.DOCX	25 February 2016
Draft England FCS statement_blanket bog_V4.DOCX	09 February 2016
Draft England FCS statement_blanket bog_V3.DOCX	08 February 2016
Draft England FCS statement_blanket bog_V2.DOCX	16 December 2015
Initial draft statement.DOCX	03 December 2015

We have provided four internal emails evidencing the sign off required for *RP2967* within Natural England's National Teams. We consider these to be in the scope of your request and are provided in the attached zip file.

Some of the information contained within the documents has been withheld as it engages Regulation 12(3) – Personal Information – of the EIRs. The names, signatures, and contact details of private individuals and past/current staff members in certain circumstances are considered by Natural England to be personal information as defined by the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

Please note that some information within the documents does not relate to the subject matter of your request and is therefore out of scope. These sections have been marked as 'Out of Scope'.

Please note that the information we have supplied to you is subject to copyright protection under the Copyright Designs and Patents Act 1988. You may re-use this information (not including logos) free of charge in any format or medium, for the purposes of research for non-commercial purposes, private study, criticism, review and news reporting. You must re-use it accurately and not in a misleading context. The material must be acknowledged as Natural England copyright, and you must give the title of the source document/publication.

However, if you wish to re-use all or part of this information for commercial purposes, including publishing and the information is not covered by the [Open Government Licence](#) you will need to apply for a licence. Applications can be sent to Enquiry Service, Natural England, Foss House, Kings Pool, 1-2 Peasholme Green, York, YO1 7PX.

This information may also contain third party copyrighted material and you will need to obtain permission from the copyright holders concerned before you re-use it.

If you have any queries about this letter, please contact me. As you may be aware, under the legislation should you have any concerns with the service you have received in relation to your requests and wish to make a complaint or request a review of our decision under regulation 11 of the EIRs, please contact me within 40 working days of the date of this letter and I'll arrange for a colleague to conduct an internal review.

If you are not content with the outcome of that complaint or the internal review, you may apply directly to the Information Commissioner for a decision. Generally, the Commissioner cannot decide unless you have exhausted the internal review procedure provided by Natural England.

The Information Commissioner can be contacted at: <https://ico.org.uk/global/contact-us/> or call on 0303 123 1113 (local rate), www.ico.org.uk.

Yours sincerely

[REDACTED]

Higher Officer – Access to
Information Legal, Governance and
External Affairs
foi@naturalengland.org.uk

Enc