

Andrew Gilruth

From: Andrew Gilruth
Sent: 05 May 2026 15:53
To: 'Natural England Access to Information Team'
Subject: Request for internal review – EIR2026/02139 – RP2967 Blanket Bog FCS

Dear Access to Information Team,

Thank you for Natural England's response dated 5 May 2026 to request EIR2026/02139.

I am writing to request an internal review under regulation 11 of the Environmental Information Regulations 2004.

My concern is that the response appears incomplete. It identifies several records that appear to be held and directly within scope of my request, but those records have not been disclosed, redacted, expressly refused under an EIR exception, or confirmed as not held.

In particular, Natural England's response states that:

1. "Two QA Review forms" were completed
2. Additional specialist comments were provided directly on the draft definition record
3. The publication workflow included a Publication Submission Form, Publications review record, Publications workflow record, Senior Approval confirmations, and Publications system record
4. TSG sign-off occurred in Round 1 through TSG meeting notes dated 13 December 2017, and in Round 2 through TSG Chair sign-off dated 5 July 2022

However, the documents supplied appear to consist only of four internal sign-off emails. These do not appear to include the QA Review Forms, specialist comments, response-to-reviewer or close-out material, publication workflow records, or the underlying TSG records referred to in the response.

I therefore ask the internal review to reconsider whether the following records, or relevant extracts, should be disclosed:

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 with draft definition – Senior Specialist (Wetlands)
 - Any other specialist comments relied upon as evidence of QA/review completion
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.
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
5. The governance records referred to in the response, including:
 - The 13 December 2017 TSG meeting note extract
 - The 6 April 2022 circulation of the revised definition 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

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.

I also ask the reviewer to consider whether the response adequately answered the wording of my original request. My request expressly asked for the completed QA/peer review checklist or form, or the closest equivalent QA completion record. The response states that two QA Review Forms were completed, but does not provide them or explain why they have not been disclosed.

Similarly, my request asked for the publication approval/workflow record or extract. The response provides a summary table, but it is not clear whether the underlying workflow record or extract has been disclosed.

For clarity, I am not asking for all drafts or underlying datasets. I am asking for the specific governance, QA, workflow and sign-off records, or the nearest equivalents, that Natural England has itself identified as evidencing the assurance and approval process for RP2967.

If Natural England considers any of the above records to be outside scope, not held, or exempt from disclosure, please explain that clearly for each record or category of record, identifying the relevant EIR exception where applicable.

Yours faithfully,

Andrew Gilruth
Chief Executive

The Moorland Association
Tower Court, Clifton Moor
York YO30 4XL



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From: Natural England Access to Information Team <no-reply@naturalengland.ecase.co.uk>
Sent: 05 May 2026 14:21
To: Andrew Gilruth <agilruth@moorlandassociation.org>
Subject: EIR2026/02139 - Request for Information - Response

Dear Andrew Gilruth

Please find attached Natural England's response to your request for information Reference EIR2026/02139.

Yours sincerely

Access to Information Team
Legal and Governance
Natural England

Email: foi@naturalengland.org.uk

Natural England Customer Enquiries (0300 060 3900)

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