

Date: 27 April 2026

Our Ref: BC2026/02086

Andrew Gilruth

By email only: agilruth@moorlandassociation.org



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

Dear Andrew Gilruth,

This letter responds to:

- 1) your letter dated 18 February 2026 requesting clarification regarding the expert review process for NEER155"; and
- 2) your letter dated 10 April 2026 which asks additional questions following an internal review of an access to information request.

From the outset, I am clear that the contents of your letters do not alter our position that the evidence review and its assurance process were carried out according to good practice. Your suggestion that there is a need for corrective action is rejected and we will not be commenting further on either the review process for NEER155, the response to EIR2026/00223 / IR2025/01669 or the internal review of the related response to that request.

18 February 2026 Letter

NEER155 is an updated evidence review on the effects of managed burning on upland peatland biodiversity, carbon and water. It builds on the 2013 review (NEER004) and follows the methodology set out by Stone (2013), which includes the recruitment of independent expert reviewers with internationally recognised peatland-specific expertise in ecology, carbon cycling, ecohydrology, biogeochemistry and wildfires. These reviewers provided comments on how the review identified, evaluated and interpreted the relevant evidence which was considered by Natural England in preparing the final draft of NEER155.

In addition to external review, the report underwent internal scrutiny by Natural England staff with expertise in evidence synthesis, wetland ecology, peatlands, peatland carbon and climate science, grazing, ornithology and invertebrates. Technical proof-reading, publication checks and accessibility review were completed, and the report went through our strategic sign off process.

Taken together, the 2013 review and the 2025 update provides a substantial body of evidence from which to draw conclusions about the impacts of managed burning and to inform practice and policy.

The combination of a recognised methodology, external expert scrutiny, internal technical review and formal governance sign-off provides assurance for the quality of the review and its findings.

10 April 2026 Letter

Natural England does not normally respond to decision letters in respect of access to information internal reviews.

In terms of reliance on Regulation 12(4)(d) EIR, the original request EIR2026/0223 did not ask for draft versions of the NEER155 report, nor did it ask for the actual peer review comments. Your second internal review email included a new information request. The purpose of internal reviews is to consider the original request and response, however we applied 12(4)(d) to then cover the additional information you had requested.

Yours sincerely,

A handwritten signature in blue ink that reads "Marian Spain".

Marian Spain

Chief Executive

Natural England

marian.spain@naturalengland.org.uk