



RESPONSE TO REGULATION 28 REPORT ON BEHALF OF NRW

To:

Rachel Knight His Majesty's Assistant Coroner

South Wales Central Coroners Court

[REDACTED]

Date 27 May 2026

Dear Madam

Response to Regulation 28 Report to Prevent Future Deaths

Inquest touching on the death of Helen Patching, Rachael Patching and Corey Longdon

We write with reference to the Regulation 28 Report to Prevent Future Deaths dated 9 February 2026 which was issued by HM Coroner following the inquest into the deaths of Helen Patching, Rachael Patching and Corey Longdon ("the Regulation 28 Report").

We, Natural Resources Wales ("NRW") are responding to the Regulation 28 Report. May we express our deepest condolences to the families and friends of Helen Patching, Rachael Patching and Corey Longdon ("the Families").

Waterfall Country

1. Waterfall Country is the name given to describe an area of the Bannau Brycheiniog National Park which is known for having a high concentration of waterfalls in Wales. Waterfall Country is found on the southwest edge of the Brecon Beacons, in an area between the villages of Pontneddfechan, Ystradfellte, and Hirwaun.
2. NRW is the largest land manager for the Welsh Government Woodland Estate ("WGWE") and manages approximately 1000ha of woodland adjacent to the wild waterfalls within Waterfall Country.
3. Visitor numbers to Waterfall Country are estimated to be a minimum of 250,000 per annum, with a potential maximum of 350,000 visitors, which has placed considerable strain upon the delicate landscapes of Waterfall Country and the surrounding communities. As principal land manager in this area, NRW holds responsibility for landowner's liabilities and statutory obligations of the Sites of Special Scientific Interest ("SSSI") and Special Areas of Conservation ("SAC"), all of which will need to be met whilst balancing the current level of visitor access to the area.
4. The 'Four Waterfalls Walk' also known as the 'Four Falls Trail' is one of the 2 main trails in Waterfall Country and comprises of 4 waterfalls: Sgwd Clun-Gwyn, Sgwd y Pannwr, Sgwd Isaf Clun-Gwyn and Sgwd yr Eira. The Four Falls Trail link trails are waymarked trails/paths from the main Four Falls Trail, which lead to: Sgwd Clun-Gwyn, Sgwd y Pannwr, Sgwd Isaf Clun-Gwyn and Sgwd yr Eira. These are public rights of way which are managed by Bannau Brycheiniog National Park Authority ("BBNPA"). These public rights of way predominantly sit amongst an area of Countryside Rights of Way Act 2000 ("CROW") dedicated land, which is managed by NRW in line with the requirements of CROW and The Occupiers Liability Act 1984.

Visitor Safety and Countryside Group

5. The Visitor Safety Group ("VSG") is a national group that was created in 1997 to develop a consistent approach to visitor safety management across the UK. Its members are owners and managers of land and property and include: NRW; BBNP; Eryri NPA; Pembrokeshire Coast NPA; WG; CADW; RNLI, ROSPA the National Trust; Natural

England; the Woodland Trust; English Heritage; the Royal Parks; the Forestry Commission; Forestry and Land Scotland; Peak District National Parks Authority; National Waterways; and the National Trust for Scotland.

6. The VSG's Group's *'Managing Visitor Safety in the Countryside — principles and practice'* refers ("the VSG Guidance"). The guiding risk management principles and practical risk management techniques set out therein have been developed and implemented by the VSG's above-named members in consultation with the Health and Safety Executive. NRW has adopted the VSG Guidance as best practice for managing visitor safety and NRW's Specialist Advisor for Visitor Safety is a member of the VSG's Management Group.

7. In summary, the VSG Guidance provides that:

"visitor safety management is about providing overall benefit to society and individuals by balancing benefits and risks. It is not about creating a totally risk-free society or stopping important recreational and learning activities."

Further, the Guiding Principles of the VSG Guidance places an emphases on:

"the importance of conservation, access and personal enjoyment in the countryside and the need to find a balance between safety and these wider objectives. The principles also underpin the balance between the personal responsibility of the visitor and the responsibility of the landowner or manager."

8. Consequently, NRW must balance risks against both the capability of visitors and the development character of a particular site.
9. Risk control measures for visitor safety in Waterfall Country are monitored and reviewed by the Waterfalls Area Safety Advisory Group ("WASAG") which comprises of representatives from: NRW, BBNPA, Mountain Rescue teams (Central Beacons and Western), Cave rescue, South Wales Outdoor Activity Provider Group, Police, Fire and rescue, ambulance service (HART team), and Ystradfellte Community Council. This group meets on a six-month basis to discuss issues pertaining to visitor

safety including (but not limited to) accidents and incidents that have occurred in Waterfall Country. Any proposed safety related initiatives are presented to this group by its constituent members to ensure a consistent approach to risk control across Waterfall Country.

10. NRW works with the South Wales Outdoor Activity Providers Group ("SWOAPG"), which describes itself as the representative organisation for all providers of outdoor adventurous activities in the South Wales and Brecon Beacons area. The SWOAPG is responsible for issuing safety alerts from NRW/BBNPA to its members, and ensuring member compliance with the Waterfall Country Activity Concordat.

Signage in Waterfall Country

11. Having undertaken a risk assessment for the Four Falls Trail and the Four Falls Trail link trails in adherence to VSG's guiding principles and risk control spectrum, NRW has identified the necessary risk control measures, and these vary according to the risk zone in which visitors are located. Risk control measures include the design and erection of signage to advise visitors of the change in risk zone at the various transition points (i.e. the points at which the visitor moves from one risk zone to another).

12. The VSG Guidance advises inter alia that:

"Well-designed safety information should:

- *alert visitors to the nature, location and severity of hazards and risks and provide information about any restrictions*
- *explain the nature and extent of risk control measures provided by the owner or manager of the site*
- *give visitors information to help them to decide for themselves about the risks to which they are likely to be exposed, and the precautions they should adopt*

- *let visitors know what is expected of them, on the understanding that they share some responsibility for their own safety".*

13. With reference to VSG's risk management principles and risk control matrix and having undertaken a visitor safety risk assessment, NRW has divided the land it manages in Waterfall Country into a series of risk zones:

12.1 Zone 1: Low hazard - parking and introduction areas (moderately developed).

12.2 Zone 2: Low increasing to medium hazard - approach through the NRW managed woodland and transition areas (VSG lightly developed through to Moderately developed).

12.3 Zone 3: High hazard - wild waterfall areas (the areas immediately surrounding and immediately adjacent to the waterfalls themselves (VSG lightly developed waymarked trails only. Underdeveloped rest of the land off the waymarked trails).

14. NRW's signage:

14.1 Provides information to visitors before they reach a particular hazard e.g. waterfalls so they (the visitors) can make an informed decision as to whether or not to proceed.

14.2 Is produced using NRW's design guide and each project is overseen by NRW's Specialist Advisor for Visitor Experience to ensure consistency across all NRW sites. The size of the signage varies with each location. Signage within a site needs to take account of the setting/location and is often A2 or A3 in size.

- 14.3 Includes lectern signs (also known as Information Panels or Safety Panels) at all of the transition/decision points between Zone 2 and Zone 3.
- 14.4 Is inspected by NRW on a monthly basis.
- 14.5 Is reviewed annually by competent persons within NRW as part of NRW's risk assessment review; and
- 14.6 Is the subject of ongoing monitoring and review by WASAG. Further, signage (alongside other issues) is specifically reviewed by this group following a major incident.

Actions Taken by NRW

15. In 2023, as part of its response to HM Coroner's Previous Regulation 28 Report to Prevent Future Deaths, NRW commissioned an independent Waterfall Country Visitor Safety Review undertaken by [REDACTED] Associates. Thereafter, NRW formed a four year Waterfall Country Project to address the review's recommendations. Actions that have been taken include, inter alia, the following:

- 15.1 In January 2025, a Waterfall Country Visitor Safety Subgroup was formed comprising members of the WASAG and the Waterfall Country Partnership to develop a Visitor Safety Plan (building on work undertaken by NRW previously). This subgroup was set up as a start and finish task group specifically for the development of a Visitor Safety Plan. The finalisation and implementation of this Plan is in the end stages, but presently on hold pending the inclusion of a Tactical Operational Plan (see point 15.2 below).
- 15.2 A Waterfall Country Tactical Operational Plan is currently being developed by emergency response services to improve their understanding of how best to respond when called out to this area. This Plan is in the process of undergoing tests by emergency services. Two exercises are planned to take place within the next three months and a final draft of this will be produced to incorporate

the outcomes of the testing. This will then feed into the Visitor Safety Plan mentioned above.

- 15.3 In September 2024, '*Warning Cliff Edge*' signs were put in place at the Sgwd Clun Gwyn Uchaf viewing area. These were replaced in October 2025 with new NRW branded signs warning of cliff edge and sudden drops. Whilst there were no reported incidents of injuries in this location, there were reports of risky behaviour at the cliff edge hence the decision was taken to install the signage in this area.
- 15.4 Given the need to develop consistent messaging so that visitors can judge for themselves the risks and whether to accept them, NRW, BBNPA and Neath Port Talbot County Borough Council ("NPTCBC") have sought the assistance of external communication specialists. BBNPA have subsequently been leading on this element of the Waterfall Country Project with NRW and NPTCBC heavily involved in contributing to developing a Waterfall Country Partnership Communication Strategy. This work is ongoing,
- 15.5 Research has highlighted that the BBNPA website is the most visited website for people seeking information on visiting the area. The plan is for the BBNPA website to be the main vehicle for communications and information for visitors and for other key stakeholder websites to signpost to the BBNPA site for information, BBNPA is currently renewing its website and incorporating the Waterfall Country Partnership Communication Strategy into the new Waterfall Country Webpage.
- 15.6 Recent works have been undertaken to upgrade some of the trails. By way of example:
 - 15.6.1 In September 2024 and July 2025 extensive trail resurfacing works were undertaken to the Sgwd yr Eira trail improving both pedestrian access and for emergency service access.

- 15.6.2 In July 2025, 120m of stone boardwalk was installed between Sgwd yr Pannwr and Sgwd Isaf Clun Gwyn replacing a timber walkway improving safe access between the two waterfalls (materials for this were flown in by helicopter in 210 lifts).
- 15.6.3 There are further plans to improve trails this financial year including Sychryd trail repairs, Four falls drainage and surface repairs. Installation of new trail section see below, Sgwd yr Eira trail stone slope works.
- 15.6.4 Former Footpath 86 was closed under legal order by BBNPA following a death in August 2022. It was extinguished on 1 February 2024, following a number of temporary closures since August 2022. Footpath 86 remains closed and there is no likelihood of this reopening due to the combination of cliff rock fall hazards and the exposed and deteriorating path edge. Barriers and signage make this clear. In addition, NRW have engaged a supplier to place permanent metal fences to seek to further prevent access to this area.
- 15.6.5 NRW has developed a new trail which by-passes the former Footpath 86. Contractors were appointed to undertake this work which commenced in January 2026 after being delayed by a number of months due to persistent inclement weather.
- 15.6.6 The construction of the new Waterfall link path was completed on 29 April 2026, costing in the region of £150,000. The new Waterfall link path provides a circular route between Sgwd Clun Gwyn Isaf and the Four Falls Trail.
- 15.7 To reduce the risk of falls from height, NRW has undertaken the following works:

15.7.1 In September 2025, post and rail fences were installed alongside the Four Falls Trail by post 22 to encourage visitors to keep to the waymarked paths and deter access onto desire lines to/from the top of Sgwd Isaf waterfall.

15.7.2 In April 2025, new safety signage was installed at Sgwd Clun Gwyn Uchaf viewing area advising the public of cliff edge and sheer drops.

15.7.3 NRW is planning the creation of a formal viewing area overlooking Sgwd Clun Gwyn Uchaf waterfall incorporating a balustrade, landscaped view points and fencing near to cliff edges. The purpose of the balustrade will be to facilitate safe viewing of the waterfall, the design of which will be to reduce the potential for climbing over the balustrade to get an even closer view of the waterfall. This work is due to be completed in 2026.

15.8 NRW conducts scheduled formal recreation inspections of visitor infrastructure along promoted walking routes on Welsh Government Woodland Estate in Waterfall Country and NRW managed car parks. Defects identified are reported on and actions taken as required.

NRW's response to HM Coroners Concerns as identified in the Regulation 28 Report

Matter of Concern 1 - "There is a high rate of accidents including some fatal accidents, from trips and slips in the area known as Waterfall Country"

16. Whilst there are undoubtedly accidents in the area, including slips and trips - the level of incidents is comparable with similar areas and activities across England and Wales. The most recent Annual Review from Mountain Rescue England and Wales

notes that 23% of the 3782 call outs across England and Wales for 2025 were as a result of a slip or a trip. This issue is therefore not unique to Waterfall Country.

17. NRW's records indicate that in this rugged and natural environment there has been eight fatalities in waterfall country in the last 5 years, these heartbreaking incidents have occurred in different circumstances with the majority of those occurring from drowning. NRW recognises that this Regulation 28 report to which we are responding was generated to address the risk of falls rather than the risk of drowning. Although measures can be and are taken to mitigate risk the hazardous and unpredictable nature of rugged terrain means that incidents of this kind may sadly still arise.
18. In July 2023, NRW secured an independent report from an expert specialising in leisure, tourism, environmental and visitor risk management. The purpose of the report was to inform its approach to visitor safety in Waterfall Country. The report, prepared by [REDACTED] looks at accidents per 1 million hours of comparable activities such as mountaineering. It explains that a standard method for comparing risk is to look at the number of accidents per 1 million hours of carrying out a specific activity.
19. When looking at the statistics for the purposes of reviewing visitor safety in waterfall country, the expert notes that non-fatal accident rates in this area (derived from analysis of Mountain Rescue Team and WASAG records for 2019/20, 2020/21 and 2021/22) are broadly in line with comparable activities such as mountaineering, caving and visiting waterfalls. The report confirms that non-fatal accident rates show that in general, Waterfalls Country visitors are not at particularly higher likelihood of having an accident. His analysis of accident data shows a preponderance of slips and falls causing lower leg injuries. These seem to occur when visitors have left the waymarked trails and in the deep parts of the gorges.

Matter of Concern 2 - “Current signage provision does not adequately address the significant additional risk of accidental falling. Many walkers fail to understand the official routes, closed and open paths and the significant risks they face”

20. Visitors are strongly encouraged to follow the official, designated paths and the official paths are waymarked. Some visitors make the decision to explore the terrain off the waymarked trails but the risks presented here are obvious. We refer to the abovementioned summary of the actions that have been taken by NRW including actions which specifically address the risk of accidental falling.

Matter of Concern 3 - “mobile telephone signal is poor to non-existent in certain more remote areas, which creates delay in alerting emergency services when accidents do occur”

21. The geographical and topographical characteristics of the location present significant and inherent limitations in improving signal. Deep valleys are known to obstruct the line of sight transmission, which is essential for mobile signal.

22. It is understood that the installation of SOS telephone boxes in such locations is not possible as the terrain would make installation, maintenance and reliable connectivity extremely challenging with the absence of nearby power and any existing communications infrastructure.

23. NRW recognises the concern around telecommunications coverage and understands the importance of reliable connectivity, particularly in emergency situations. While responsibility for telecommunications infrastructure does not sit with NRW and instead rests with bodies such as national regulators and private network providers, NRW has been working constructively with BBRNA to identify practical steps it can take. As part of this, NRW will install a dedicated waymarker to highlight a location where cross-network emergency signal is available for 999 calls. This location will be clearly identified on waymarkers in the area, including a what.3.words (this is an application to identify the precise location) reference and the location name.

In Conclusion

24. NRW wishes first to express its deepest sympathy to the families of those who have lost their lives. We recognise the profound impact of these deaths and understand the grief and distress experienced by the families affected.

25. HM Coroner and the Families can be assured that:

25.1 The safety of visitors to Waterfall Country is of the utmost importance to NRW and we remain committed to working collaboratively with the BBNPA and others including through ongoing participation in the WASAG to reduce risks wherever reasonably practicable.

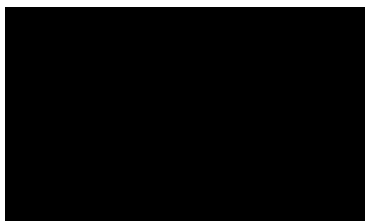
25.2 NRW's risk management processes and procedures reflect the VSG Guidance which has been adopted as best practice by landowners and managers across England, Wales and Scotland and is consistent with other areas that have seen a number of fatal incidents such as Eryri.

25.3 The signage that has been put in place by NRW in Waterfall Country reflects the principles of the VSG Guidance and is intended to addresses the risks of accidental falling.

25.4 Risk control measures in place across Waterfall Country are monitored and reviewed through the WASAG, with signage remaining the subject of ongoing and constructive collaboration.

26. We trust this response provides assurance to both HM Coroner and the families that action has been taken and continues to be taken by NRW to address HM Coroner's concerns, while keeping the safety of visitors at the forefront of its approach.

Yours faithfully



Chief Executive Officer
Natural Resources Wales