

Safety, innovation and diversity in building design

External position – approved by Executive Board, 6 June 2025

1. As leaders in the built environment, specialising in the technical design and functional performance of buildings, Chartered Architectural Technologists are committed to ensuring that the buildings in which people live and work meet the highest standards of safety and quality.
2. In the UK, building regulations (overseen by building control) lay out the functional requirements which all new buildings must meet. By definition, a building which complies with building regulations will have met the minimum design standards for a “safe” building (as defined by regulations), irrespective of who it is designed by, and constraining who can carry out design functions will not make a compliant building inherently safer. Importantly, despite periodic calls for “protection of function” for specific building design professions, the UK has maintained a non-prescriptive approach to building regulations, allowing flexibility both in terms of how performance standards are delivered, and in who can hold responsibility for design.
3. **CIAT strongly supports this flexible regulatory model, which allows diversity and innovation in building design.**
4. Nonetheless, recent events, notably the Grenfell Tower Fire, in which 72 people died, have shed light on weaknesses in accountability for building design safety. As a result, regulations now lay out specific responsibilities for various dutyholders, including clients, contractors, principal contractors, designers and principal designers (PD BR).¹
5. In some cases, these changes make explicit duties which should have been implicit before; for example, designers must “take all reasonable steps” to ensure that their design would comply with regulations if built as designed. Other changes genuinely clarify ambiguities in accountability which existed prior to the new regulations. For example, all projects should now have an identified PD BR, responsible for overseeing and coordinating design work (although in some cases, the client may act as PD BR themselves, which may create gaps in the wider safety infrastructure). While having a clearly defined person with oversight of the whole design has always been good practice, the complexity of modern projects has often led to a lack of clarity in accountability and oversight. Revised regulations help close this gap.
6. Importantly, the PD BR has been given additional duties with regard to higher-risk buildings, viz., providing copies of designs to be included as part of a “golden thread” of building information, supporting regulatory gateway submissions, certifying at building control submission and completion that the design complies with regulations, and ensuring appropriately frequent inspection of works. In effect, these are now protected functions, which should only be undertaken by “competent” professionals. It is currently the duty of the client to determine whether a professional is competent to be PD BR.
7. **While CIAT favours the continuation of a broadly permissive model, which does not set arbitrary limits on which professionals can deliver building design services, the Institute is also sensitive to the need for continuous improvement in building safety.**
8. As highlighted in the findings of the Grenfell Tower Inquiry, membership of a specific professional body is no guarantee of competence, and relying on the judgement of non-expert clients for

¹ The PD BR role should not be confused with the Principal Designer (Construction Design and Management) role, which entails oversight of health and safety during building design and construction.

determining competence (particularly competence to act as PD BR) creates alternative risks. Clients may look to the various principal designer registers (established by CIAT, RIBA and the APS) which now exist to provide some assurance of competence, however requirements for the registers vary significantly, and interpretations of competency in this context have not yet been tested in a legal setting, creating further ambiguity.

9. As such, **if and only if it is felt there is a need to further strengthen oversight of building design**, and that reformed accountabilities and strengthened building control oversight of regulatory compliance are insufficient, there are two clear, and potentially acceptable routes to achieve this:
 - I. **Provide greater specificity as to what is required in order to be “competent” to act as a PD BR.** This could be achieved in several ways including the following:
 - a. Requiring membership of a Chartered Professional Body in the built environment sector (though Chartered Membership does not necessarily indicate ongoing competence to take on the specific role of PD BR, so additional revalidation may become necessary).
 - b. Requiring membership of one of the existing principal designer registers. For greater security, if this route approach is followed, government should require these registers to align to a common framework, based on the appropriate British Standard, and should set common requirements for demonstrating ongoing competence.
 - c. Requiring registration with an independent regulator, which could set requirements for registration and revalidation.
 - II. **Expand the range of activities which are to be carried out by the PD BR (or the principal contractor).** This might include:
 - a. Shifting responsibility for the entirety of building control submissions and completion certificate applications from the client to the PD BR.
 - b. Requiring PD BR sign-off of certain key design documents (as part of building control submissions) and curtailing the ability of professionals who are not the principal designer to amend designs without oversight. Oversight of a broader range of functions (such as preparing technical designs) could be provided to a wider range of competent designers, with a similar model of registration.
10. Should Government opt to pursue a registration or membership requirement for demonstrating competence to take on protected functions, **it would be essential that no competent professional was excluded from securing the relevant membership or registration to demonstrate competence.** This would likely require establishing a professionally agnostic framework for competency, mandating that registers maintained by professional bodies are open to non-members of those bodies, or ensuring that every relevant professional body can easily establish a register to a common framework.
11. These, and any further restrictions on the delivery of building design services, would need to be carefully designed, with input from all relevant professions, and balanced with the need to enable innovation in the built environment. However, **CIAT believes that it would be possible to achieve safeguards as outlined above without damaging to the various professions which must collaborate to deliver modern construction projects.**