

# Egniol Practical Guide

For The Principal Designer Role Under the Building Safety Act (2022)

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# Executive summary (read this first)

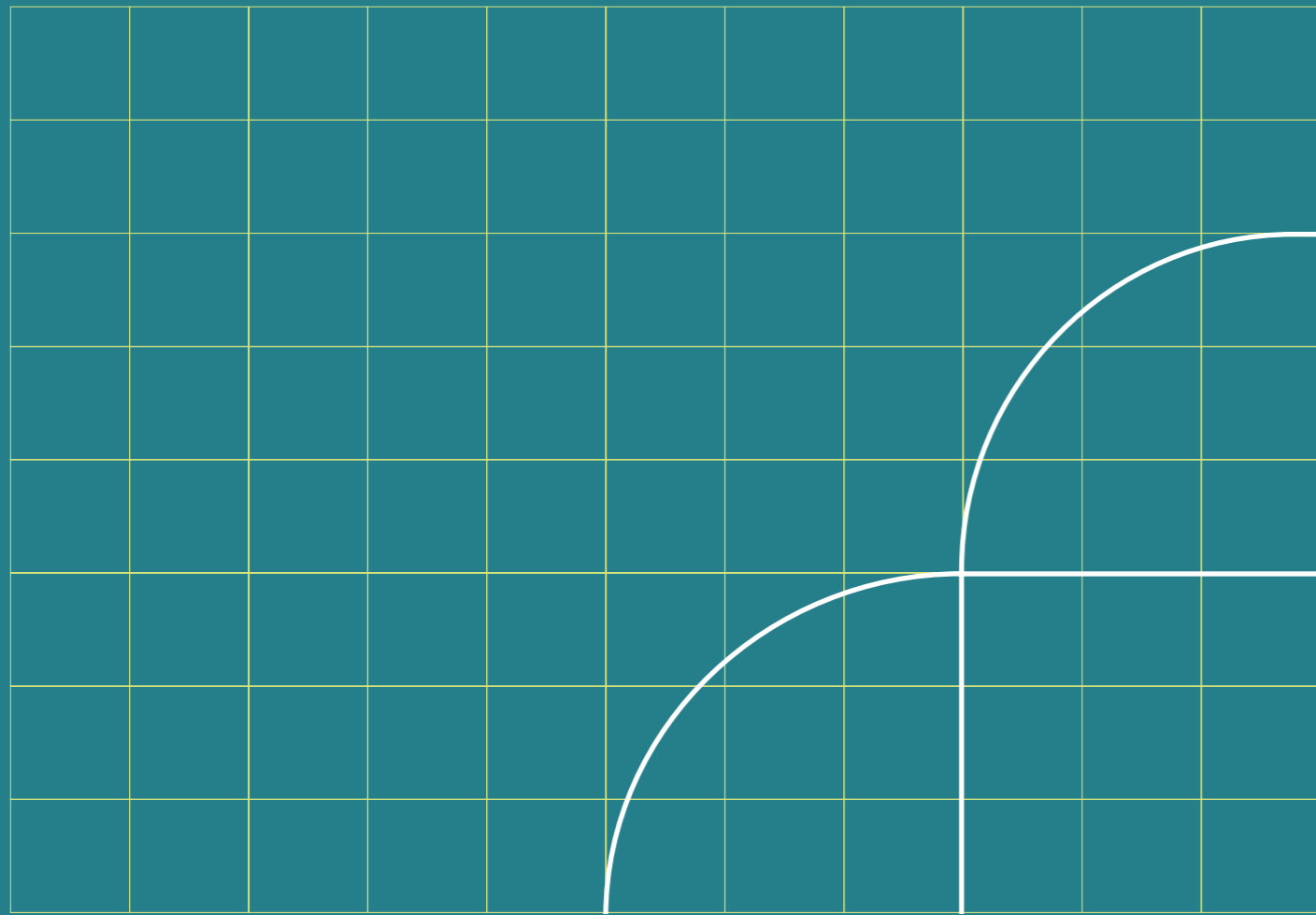
The Building Safety Act (BSA) has reshaped how design and compliance are managed in England and Wales. A new **Principal Designer role under the Building Regulations (PD-BR)** now sits alongside the familiar **Principal Designer under CDM 2015 (PD-CDM)**. If your project requires **Building Regulations approval**, you must appoint **both a Principal Designer (Building Regs) and a Principal Contractor (Building Regs)** and be able to show that all reasonable steps were taken to achieve compliance.

**What this means for non-HRB projects:** Although High-Risk Buildings (HRBs) have grabbed the headlines, the dutyholder model applies **across the board**. For non-HRBs, expect a **proportionate** but more structured approach to competence, coordination, documentation and change control—leading to fewer late surprises and smoother approvals.

**What the PD-BR actually does:** The PD-BR **plans, manages and monitors** the design so that, **if built as designed**, the works comply with **relevant Parts A–S** of the Building Regulations (structure, fire, access, energy efficiency, ventilation, drainage, etc.). They coordinate designers, steer design reviews, maintain a compliance trail and work in tandem with the Principal Contractor.

**Why appoint early:** Clients must **appoint in writing** (and for controlled work **notify Building Control within 14 days**) and verify **competence (Skills, Knowledge, Experience and Behaviours - SKEB)**. Appointing late (or not at all) causes confusion, default appointments by law, and higher risk.

**Egniol's role:** As civil and structural engineers with multi-disciplinary partners, Egniol can act as PD-BR (or support your lead designer) and implement proportionate systems—**compliance matrix, decision logs, change control and handover packs**—to make compliance visible, efficient and defensible.



# 1. Why the role changed (and why it matters on non-HRBs)

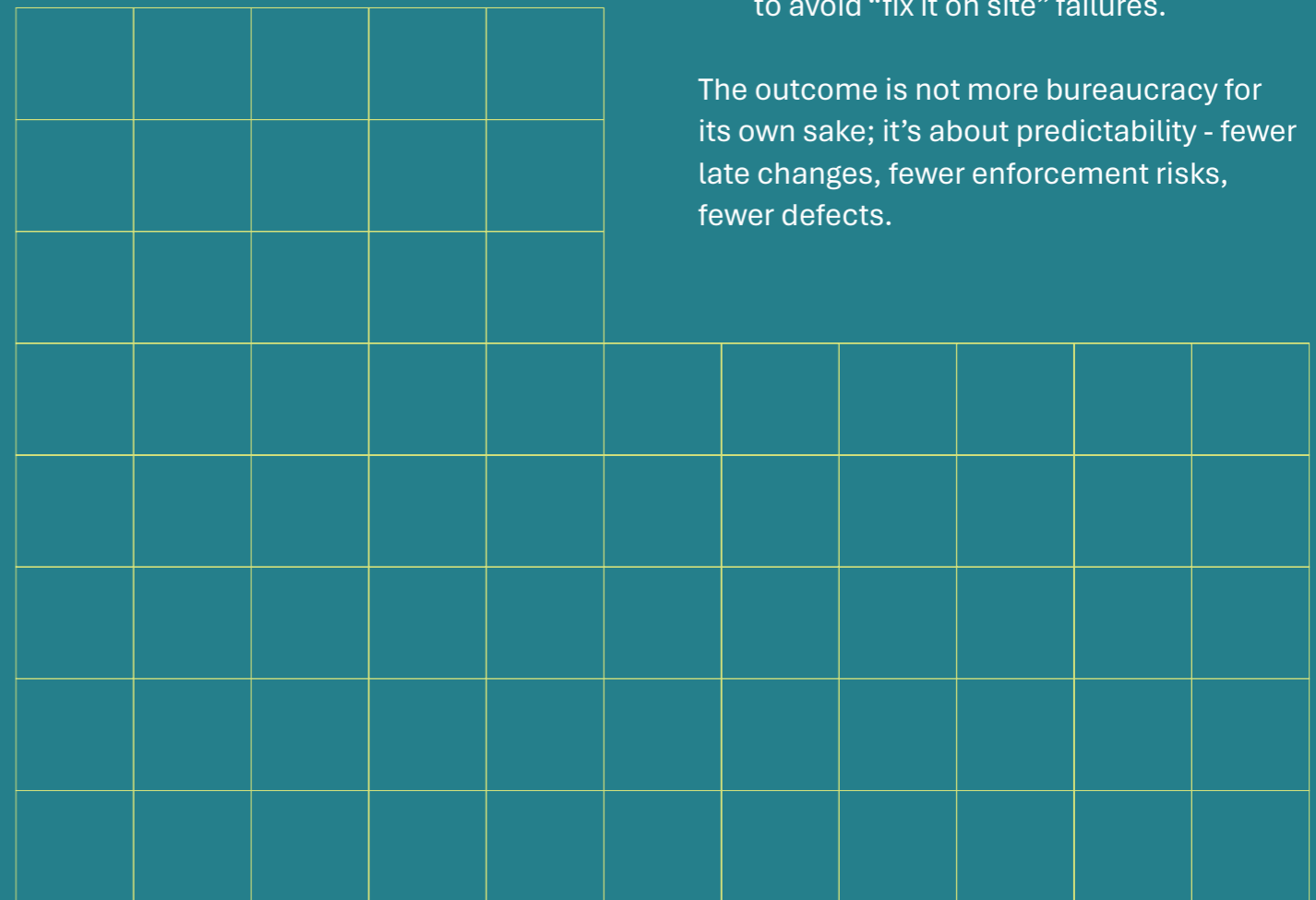
The BSA is a system-wide response to prevent a repeat of systemic failings highlighted by Grenfell. It introduces accountable dutyholders and explicit competence requirements that now **apply to all projects needing Building Regulations approval**, from small residential extensions to complex commercial refurbishments.



While HRBs have additional controls (Gateways, golden thread, regulator oversight), non-HRB projects are expected to **adopt the same mindset**, scaled to size and complexity:

- **Clear accountability:**  
Named dutyholders with defined responsibilities.
- **Competence as standard:**  
Skills, Knowledge, Experience and Behaviours (SKEB) must be evidenced.
- **Demonstrable compliance:**  
A visible trail of reviews, decisions and checks - showing all reasonable steps were taken.
- **Earlier collaboration:**  
Coordinated design before construction to avoid “fix it on site” failures.

The outcome is not more bureaucracy for its own sake; it’s about predictability - fewer late changes, fewer enforcement risks, fewer defects.



## 2. Same title, different purpose: PD-CDM vs PD-BR

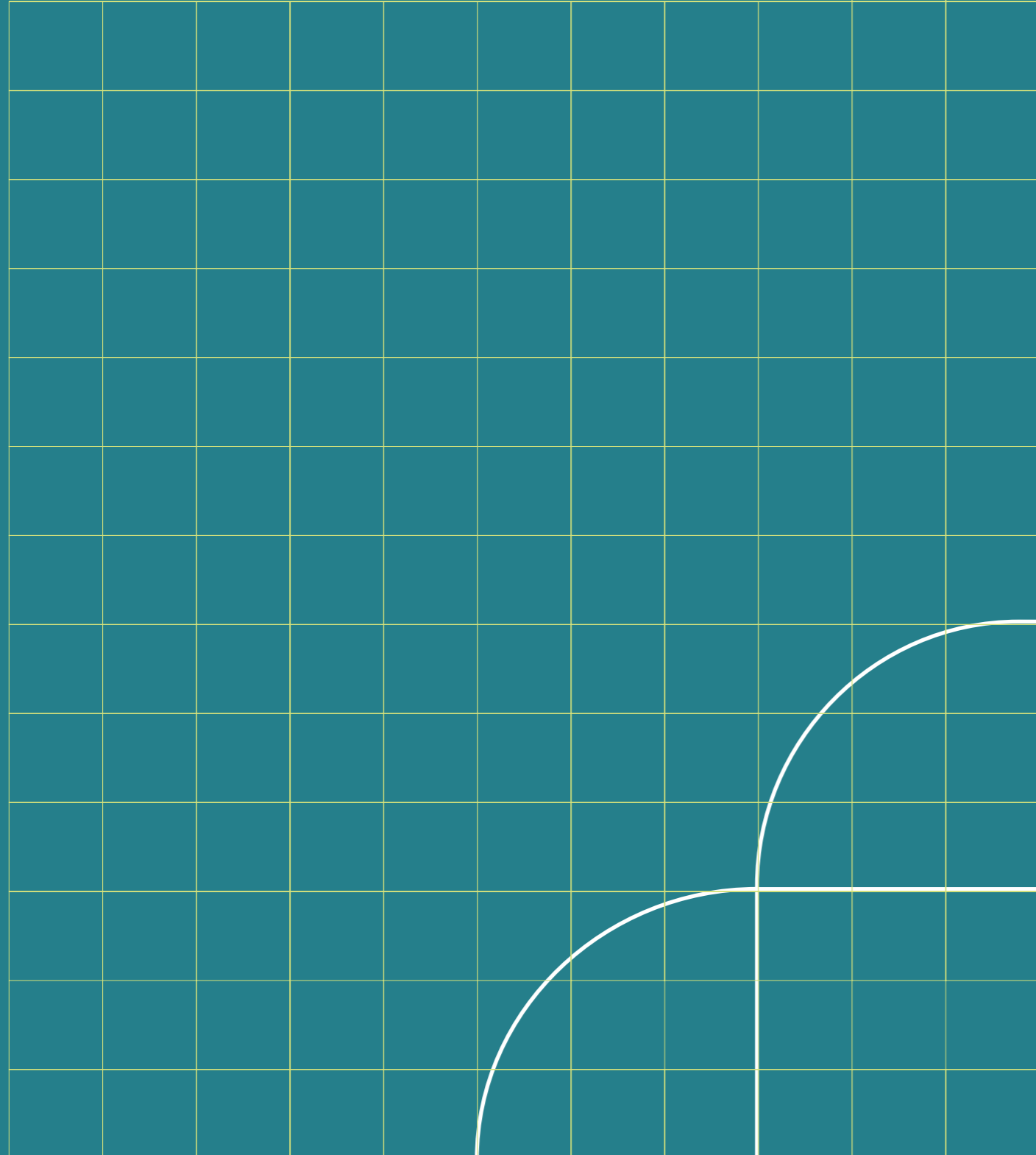
**PD-CDM (CDM 2015):** Leads the **management of health and safety** during the pre-construction phase - eliminating/controlling risks through design and ensuring designers carry out their CDM duties.

**PD-BR (Building Regulations):** Leads the **management of design compliance**, coordinating all designers so the **proposed design**, if built, **meets relevant Building Regulations (Parts A–S)**. This includes structure (Part A), fire safety (Part B), site prep & resistance to contaminants/moisture (Part C), toxic substances (Part D), sound (Part E), ventilation (Part F), hygiene & drainage (Part G/H), combustion appliances (Part J), conservation of fuel & power (Part L), access (Part M), and so on.

On many schemes a single, **competent** organisation may perform both roles to avoid duplication - **but they are distinct legal duties** with different focal points. If the client does not appoint a PD-BR, the **designer in control of the design** can be deemed the PD-BR by default, which is rarely desirable.



# 3. Dutyholders at a glance: who must do what



## Client (ultimate accountability)

- **Appoint in writing a PD-BR and a PC-BR as early as practicable.**
- **Verify competence** (SKEB and organisational capability) for those roles.
- **Provide information** (existing drawings, surveys, Site Investigation (SI), fire risk info, previous approvals).
- **Notify Building Control** of PD-BR/PC-BR appointments **within 14 days** (for controlled work).
- **Completion declarations:** At the end, make (or facilitate) required compliance declarations.

**Risk if missed:** Regulatory breach, delays, potential enforcement.

## Principal Designer (Building Regulations)

- **Plan, manage, monitor** the design phase to achieve compliance.
- **Coordinate designers** (architect, structures, Mechanical, Electrical and Plumbing (MEP), fire, façade, acoustics, etc.).
- **Lead design reviews** at defined milestones; maintain a **compliance matrix**; log key decisions (especially where guidance is interpreted or performance-based routes used).
- **Liase with the PC-BR** to manage buildability and **change control**; keep Building Control feedback in the loop.
- If an **organisation** acts as PD-BR, it must **name a designated individual** responsible for PD-BR functions.

**Outcome:** A coordinated, evidenced pathway to sign-off.

## Principal Contractor (Building Regulations)

- **Plan, manage, monitor** construction to deliver the **compliant design** - quality control for structure, fire-stopping, services penetrations, materials to **Regulation 7** (appropriate materials), etc.
- **Coordinate contractors**, check **sub-contractor competence**, and **cooperate** with PD-BR on design queries/changes.
- Prepare **handover information** (e.g., **Regulation 38** fire safety information, as-builts, test certificates) for client acceptance.

**Outcome:** Construction that aligns with the approved design intent.

## Designers & contractors (all)

- **Designers:** Take **all reasonable steps** to ensure their designs are **compliant**, provide sufficient information to others, coordinate interfaces, and raise concerns early.
- **Contractors:** Must **not** build non-compliant work, must supervise competently, and escalate compliance issues.

## 4. Competence and assurance (SKEB, organisational capability and PAS 8671)



### The BSA makes competence explicit:

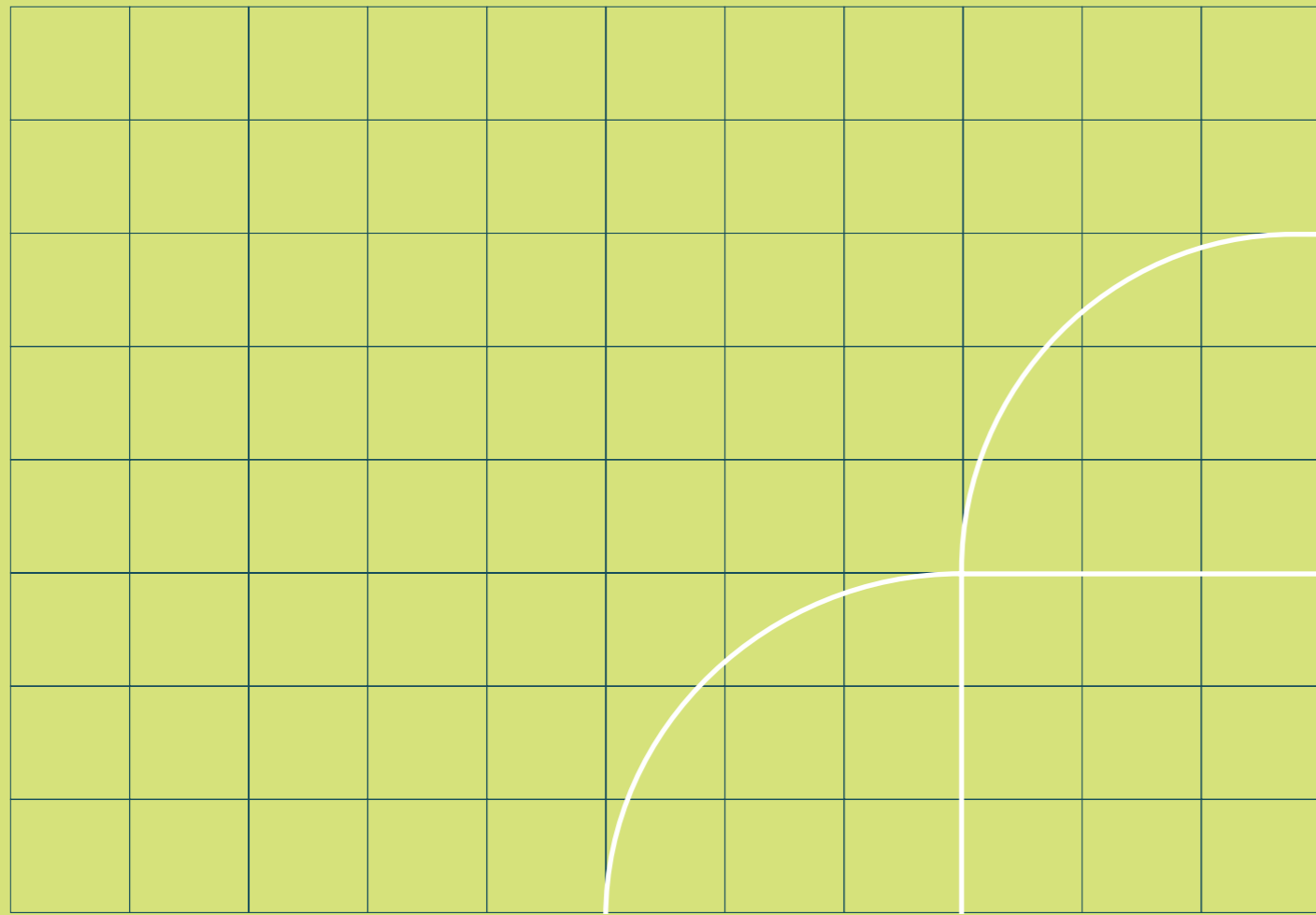
- **Individuals** must have the **Skills, Knowledge, Experience and Behaviours (SKEB)** to undertake their tasks.
- **Organisations** acting as PD-BR must demonstrate **organisational capability** (systems, resources) and **nominate a designated individual** to lead PD-BR functions.
- Sector frameworks - such as **PAS 8671** (Principal Designer competence) - describe capabilities across technical knowledge, leadership, communication and

ethical behaviours. Professional registers (e.g., RIBA PD Register; engineering registers) help demonstrate readiness.

- Expect increased scrutiny of **CVs, chartership, Continuous Professional Development (CPD) logs, relevant project experience and QA procedures**

For clients, competence checks are now a **core duty**, not a nice-to-have. For PD-BRs, ensuring all design contributors are competent is part of the role. For the market, competence is shifting from implicit to evidenced.





## 6. Non-HRB vs HRB (context and what to borrow)


**Non-HRB projects** (the focus of this guide) proceed via local authority Building Control or Registered Building Control Approvers. Dutyholders still apply; the expectation is a **proportionate** level of organisation and evidence.



**HRB projects** (typically  $\geq 18$  m or 7+ storeys, plus certain hospitals/care homes) face **Gateways**, the **Building Safety Regulator** as the BCB, and a formal **golden thread** of information. PD-BR and PC-BR duties include specific Gateway submissions and competence declarations.

**What to borrow for non-HRBs:**

- Clear **role declarations** and **competence evidence**.
- A scaled **golden thread mindset** — orderly, accessible records.
- Documented **change control** and **interface checks**.
- Early agreement on **witness/hold points**.

# 7. Common pitfalls (and how to avoid them)

- 1 **No early appointment** (or no written appointment) of PD-BR/PC-BR  
**Impact:** Role confusion, default appointments, poor coordination.  
**Avoid:** Appoint **early, in writing**; notify BC within 14 days.
  
- 2 **Competence assumed, not evidenced**  
**Impact:** Client exposure; PD-BR carrying risk; weak defence if challenged.  
**Avoid:** Check **SKEB**, organisational capability, and **designated individual**; keep records.

- 3 **Siloed design work**  
**Impact:** Missed interfaces (e.g., door clear widths, fire compartments, penetrations), late rework.  
**Avoid:** Multidisciplinary reviews; **compliance matrix**; explicit interface checks.
  
- 4 **Weak change control**  
**Impact:** Non-compliance introduced via VE/substitutions; ambiguity on current drawings/specs.  
**Avoid:** Written **protocol**; no change implemented without PD-BR compliance review.
  
- 5 **Poor documentation**  
**Impact:** Hard to prove “all reasonable steps”; delays and disputes.  
**Avoid:** **Decision logs, review minutes, version control**, referenced evidence bundles.

- 6 **Late contractor engagement**  
**Impact:** Buildability issues that undermine compliance or quality.  
**Avoid:** Early **PC-BR input**; joint PD-PC checkpoints on compliance-critical details.
  
- 7 **Over- or under-doing paperwork**  
**Impact:** Burden without benefit, or blind spots.  
**Avoid:** **Proportionate** approach - focus on risk and impact.
  
- 8 **Relying on Building Control to “catch it”**  
**Impact:** Last-minute changes, rework and potential compliance issues or enforcement action.  
**Avoid:** Ensure the Principal Designer (Building Regulations) leads coordination early; Building Control should check compliance, not fix the design.
  
- 9 **Ignoring HRB learning**  
**Impact:** Missed opportunities to improve outcomes on non-HRB projects.  
**Avoid:** Borrow HRB discipline - scaled to complexity.



# 8. Implications by stakeholder


## Developers & clients

### If you are a developer or client:

- Ask your team **who is PD-BR** and **who is PC-BR** - and whether appointments are **in writing** and **notified**.
- Request a simple Building Regs (Part A-S) **matrix** and **review schedule** within the next fortnight.
- Check how **competence** is evidenced (CVs, chartership, registers, CPD).
- Agree **change control** and **witness points** with the PD-BR and PC-BR.

Expect a small uplift in front-loaded coordination - but a large reduction in **risk, delay and rework**. Budget for PD-BR services and proportionate design reviews; be prepared to **sign declarations** and to demonstrate **informed, competent appointments**. The upside is smoother approvals and greater confidence that the finished building is both compliant and robust.

**Value case:** A modest investment in PD-BR time typically pays back through fewer change orders, faster approvals, and reduced defects at completion.

## Design consultants (architects, engineers, specialists)

### If you are a designer:

- Confirm whether you are expected to act as **PD-BR**; validate your **competence/PI cover**.
- Stand up a **compliance matrix** and **decision log** (keep them lean but live).
- Proactively coordinate **interfaces** and liaise with Building Control early.

Lead designers will often take the PD-BR role - ensure your **competence (and PI cover)** align with the duty. Allocate time for **co-ordination, evidence collation, BC liaison, and change control**. Demonstrate SKEB using **registers/certifications** (e.g., PAS-aligned training, professional listings). Build a culture of early **interface checks** and documented decisions.

**Practical tip:** Use simple, shared artefacts - a one-page responsibility matrix and a living compliance checklist go a long way.

## Contractors & builders (Principal Contractor)

### If you are a contractor:

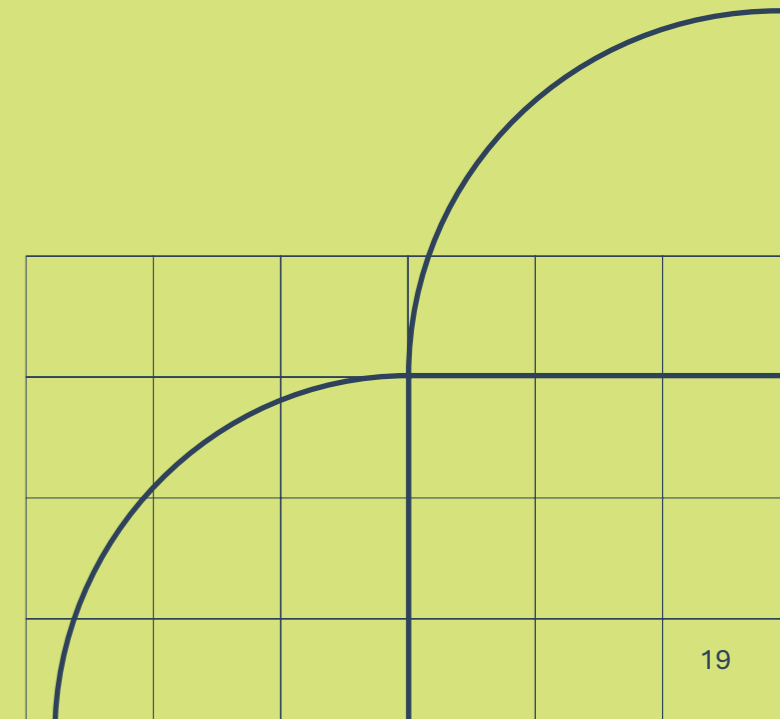
- Confirm the **PC-BR** role and sub-contractor **competence checks**.
- Implement **evidence capture** at key stages (e.g., fire-stopping photos before concealment).
- Start assembling **Regulation 38** information from day one.

Your accountability is elevated: building **to the compliant design** is now explicit. Vet sub-contractor **competence**, cooperate with PD-BR on **design queries/changes**, and plan to **evidence** compliance (photos of fire-stopping before close-up, test certificates matched to locations, materials provenance for **Regulation 7**). Start **Regulation 38** collation early.

**Practical tip:** Agree a handful of hold points (e.g., fire-stopping, cavity barriers, structural fixings) where evidence is captured before works are concealed.

## Building Control / regulators

You should see better-coordinated submissions, named dutyholders and clearer competence evidence. The dutyholder model moves effort **upstream**: fewer last-minute fixes, more predictable outcomes. The regulator role remains crucial - but is complemented by more mature self-coordination by industry teams.



# 9. Practical checklist: 12 actions & questions to keep you right

**If you can answer 'yes' to all  
you're in strong shape.**

**1. Appointments:** Have we appointed in writing a PD-BR and PC-BR—and notified Building Control within 14 days (for controlled work)?

 Client

**2. Competence:** How are we evidencing SKEB for PD-BR, PC-BR and key designers? If PD-BR is an organisation, have we named the designated individual?

 Client/PD

**3. Part A-S matrix:** Do we have a responsibility/evidence matrix mapping each Building Regs (Parts A-S) to named designers and deliverables?

 PD

**4. Baseline info:** Are surveys/SI/ existing drawings/constraints collated and issued?

 Client

**5. Design reviews:** Are milestone reviews (concept, mid-technical, pre-construction) scheduled with minutes and decision logs?

 PD

**6. Interface checks:** Have we explicitly checked fire/structure/access/MEP/ acoustics/façade interfaces and recorded outcomes?

 PD + discipline leads

**7. Change protocol:** Is there a written change process? Do we stop changes proceeding without compliance review and updated docs?

 (PD/PC)

**8. BC liaison:** Are submission packs coordinated, and are plan-check comments tracked to closure and re-issue?

 PD

**9. Construction checkpoints:** Have PD-BR and PC-BR agreed witness/hold points for compliance-critical work?

 PD/PC

**10. Regulation 7:** Are material choices and product provenance captured (especially for fire-related systems)?

 PD/PC

**11. Regulation 38:** Is fire safety information being assembled progressively (not at the last minute)?

 PC/PD

**12. Close-out evidence:** Will we have a concise PD-BR statement and a clear, indexed handover pack at completion?

 PD/PC

# 10. Key figures & facts (for reference and panels)



- **Two PDs now exist:**

**PD-CDM** (health & safety in design) and **PD-BR** (design compliance). (Source: HSE/BSR overview, 2024)

- **Appointment & notification:**

Clients must appoint PD-BR and PC-BR **in writing** and **notify Building Control within 14 days** (for controlled work). (Source: HSE/BSR overview)

- **SKEB competence:**

Individuals require **Skills, Knowledge, Experience and Behaviours**; organisations must show **organisational capability** and name a **designated individual** for PD-BR. (Source: APS briefing; PAS 8671 competence framework)

- **Regulation 7:**

Requires **appropriate materials** - product provenance and conformity must be evidenced. (Source: Building Regulations)

- **Regulation 38:**

**Fire safety information** must be handed to the client at completion. (Source: Building Regulations)

- **HRB thresholds:**

Typically **≥18 m** or **7+ storeys**, plus certain hospitals/care homes; HRBs have **Gateways**, regulator oversight and a formal **golden thread**. (Source: HSE/BSR overview)



# 11. Higher-Risk Buildings: A Brief Note

It's worth noting how higher-risk buildings (HRBs) differ, to put the non-HRB process in context. HRBs (generally residential buildings over 18m or 7+ storeys, plus certain large hospitals and care homes) face additional requirements overseen by the Building Safety Regulator.

For HRBs, the Principal Designer and Principal Contractor must go through **Gateway approvals** at design and pre-occupation stages [weco.co.uk](http://www.weco.co.uk).

They also have to submit a formal **Competence Declaration** and **Building Regulations Compliance Statement** with the Building Control application [ribaj.com](http://www.ribaj.com).

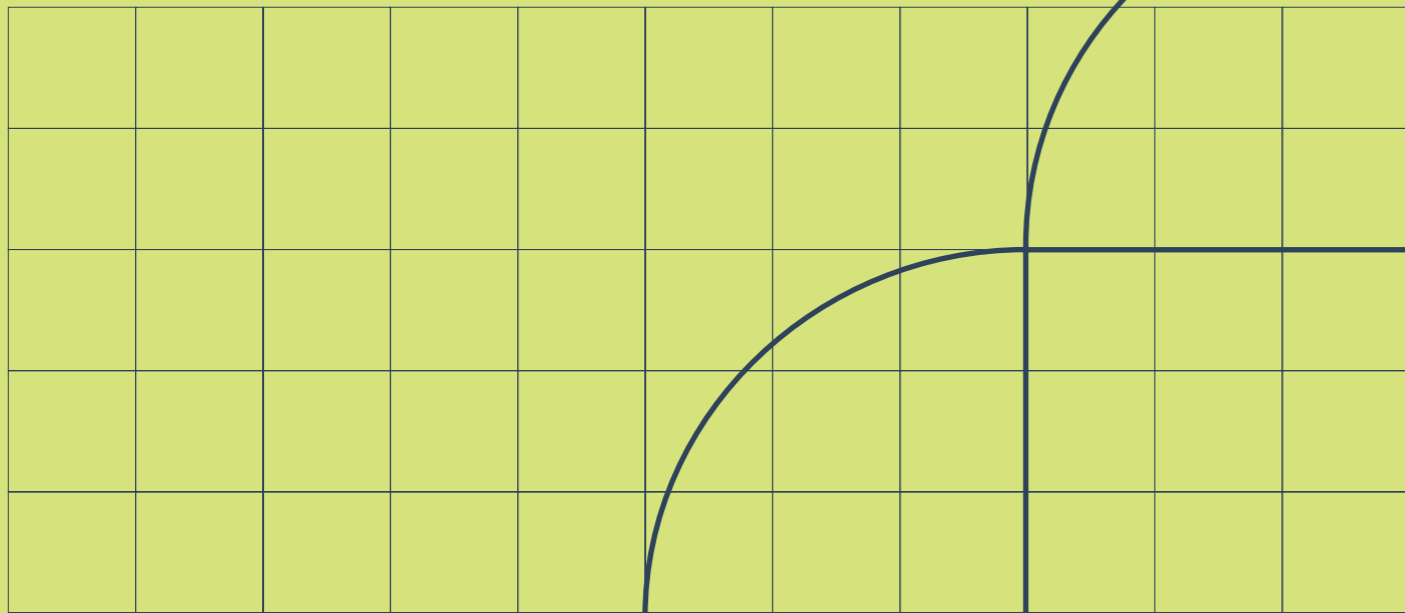
During construction, the PD must ensure an appropriate frequency of inspections for "safety occurrences" (critical issues related to structure/fire) [ribaj.com](http://www.ribaj.com).

There is also the concept of the **Golden Thread** – a digital record of the building's safety information that the client (Accountable Person) must maintain. Other dutyholders contribute to this thread by sharing information. While non-HRB projects don't legally require a Golden Thread or Gateways, these concepts influence best practices. For example, many of the coordination and documentation steps we recommended mirror the Golden Thread approach, just on a voluntary basis.

Non-HRB dutyholders can take a cue from HRB requirements: keeping thorough records, focusing on fire/structure integrity, and actively managing changes. Also, HRBs highlight the importance of rigorous competence – HRB PDs will often need specialty expertise or accreditation (there are even separate competency tiers for HRB projects [ribaj.com](http://www.ribaj.com)).

For readers of this guide, the main point is that the stakes are higher for HRBs, but **all projects benefit from the safety culture shift**. By demystifying the PD role on a small project today, you're better prepared if tomorrow you work on a high-rise where these practices are mandated.

Egniol, as a firm with multi-sector experience, stays abreast of both HRB and non-HRB regulations – ensuring that lessons learned at the cutting edge of safety are applied to every project we touch.



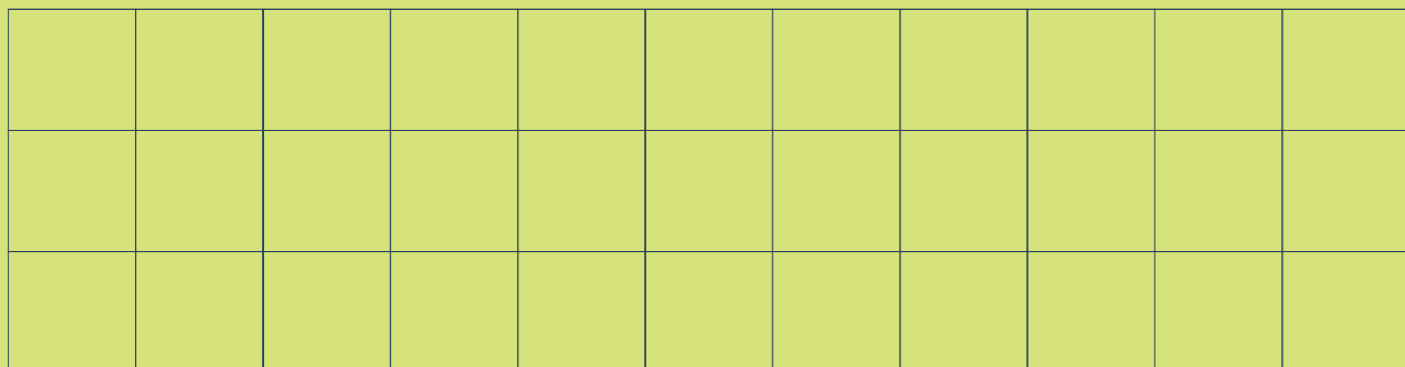
## 13. Next steps & how Egniol can support

Our team would welcome the opportunity to discuss how Egniol can support your project through design development, coordination and compliance.

We can:

- Support the design team with compliant civil and structural engineering input
- Work alongside your appointed Principal Designer to ensure clarity and coordination
- Provide practical insight into how Building Regulations are applied within design
- Help identify and resolve design challenges early to reduce risk later in the project

We are happy to share insights, answer questions and work collaboratively with your team to support a smooth and well-coordinated design process.



## Supporting your Building Safety Act compliance with confidence

We hope this guide has provided a clear understanding of the Principal Designer role under the Building Safety Act and how it supports safer, more accountable project delivery. At its core, building safety is about protecting people, and the Act strengthens oversight during the design stage to ensure risks are identified, understood and addressed early. While the requirements can initially appear complex, in practice they reflect what well-managed projects should already deliver. Clear design information coordinated input across disciplines, and a structured approach to compliance all contribute to better outcomes and fewer issues during construction.

At Egniol, we support this process as part of the wider design team. As civil and structural engineers, we work closely with appointed Principal Designers, architects and other consultants to ensure our designs are compliant, well-coordinated and clearly communicated.

Our focus is on delivering robust, buildable designs that align with Building Regulations and integrate effectively with the wider project. This includes:

- Producing clear, accurate and compliant design information
- Working collaboratively with Principal Designers to support coordination and design clarity
- Liaising with architects, contractors and specialists to resolve interfaces and reduce risk
- Ensuring our designs are fully aligned with relevant standards and regulatory requirements

By maintaining close communication with the Principal Designer and wider team, we help ensure there is a consistent and well-understood approach to design development and compliance.

Our experience across a wide range of projects means we understand both the technical requirements of Building Regulations and the practical challenges of delivering them on site. We bring a pragmatic, straightforward approach, helping to reduce ambiguity, improve coordination and support efficient project delivery.

Rather than adding complexity, our role is to support a clear and structured design process, giving clients and project teams greater confidence that compliance requirements are being met through well-developed, coordinated design.

**Interested in strengthening your project's design and compliance approach?**

Our team would welcome the opportunity to discuss how Egniol can support your project with Building Safety Act compliance. We're happy to share insights, answer questions, and explore how our multidisciplinary expertise can help keep your project compliant and moving forward.

## Engineering for our environment

Ready to take the next step in strengthening your project's compliance framework? Reach out to Egniol's team for a consultation or to learn more about how we support and work collaboratively with Principal Designers, and our building safety expertise and services. Whether you're a developer seeking end-to-end support or a fellow consultancy looking to bolster your capabilities, we're happy to share our expertise.

The Building Safety Act has raised the bar for everyone – with Egniol as your partner, you can be confident of clearing that bar and delivering buildings that are not just lawful, but truly safe and sound. Here's to building a safer future, together.

**Speak to Egniol: and gain expert support on proportionate compliance that saves time, risk and cost.**



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### Notes on sources

- HSE / Building Safety Regulator: Building Control – an overview of the new regime (2024).
- APS (Association for Project Safety) briefings: Dutyholder roles & competence under the BSA.
- PAS 8671: Framework for Principal Designer competence.
- Building Regulations: Particularly Regulation 7 (materials) and Regulation 38 (fire safety information); Approved Documents Parts A–S.



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