



GUIDANCE

PRINCIPAL DESIGNER BUILDING REGULATIONS (England)

THE APS PD BR REGISTER Scheme Outline

April 2026

Introduction

The Building Safety Act 2022 facilitated changes to the Building Regulations 2010 (England) by the introduction of the Building Regulations etc (Amendment) (England) Regulations 2023.

The new duty holder roles introduced in Part 2A of these regulations had been widely anticipated, following recommendations by Dame Judith Hackitt in 2020 and the introduction of PASs 8671, 8672 and 8673 in 2022 followed by the BS8670-1:2024 in May 2024.

Part 2A introduces dutyholders with the same name as those in CDM2015, but the Building Regulations are a separate set of regulations, and the two sets of dutyholders perform distinct roles within the context of their respective regulations. The APS scheme does not combine CDM competency assessments with Principal Designer Building Regulation competency assessments.

One dutyholder now faced with significant and potentially onerous duties is the Client.

The APS Principal Designer Building Regulations (PDBR) competence assessment scheme and register of assessed individual Principal Designers Building Regulations is designed to

- (a) Allow individuals to evidence their competency.
- (b) Allow their employer to evidence that they have organisational capability; and
- (c) Facilitate a search mechanism for clients to meet their legal duty to appoint only competent persons.

Many Designers carry out Building Regulations work as part of their everyday practice and are therefore familiar with both the Regulations themselves and Building Control procedures. The APS scheme focuses on applicants providing evidence of their practical experience (“doing”) in relation to the Building Regulations, relevant legal compliance, and Building Control processes. It is important to note that the Approved Documents provide guidance on how to meet the functional requirements of the Building Regulations but are not, in themselves, legally binding.

The APS competence assessment scheme for Principal Designers Building Regulations (PDBR) provides assurance to employers and clients that individuals have been assessed against a set of criteria based on PAS 8671.

APS is ISO9001 accredited, and our processes and procedures meet this standard.

This document describes the APS Principal Designer Building Regulations (PDBR) Register (‘the Register’).

Measuring and demonstrating competence

PAS 8671:2022 Principal Designers Building Regulations (PDBR)

The competence standard for Principal Designer Building Regulations (PDBR) is based on PAS 8671:2022 Built environment – Framework for competence of individual Principal Designers – Specification

PAS 8671 addresses competence thresholds that individuals are expected to meet when managing the dutyholder functions of the PDBR role. It also specifies the minimum competence thresholds needed by PDBRs and the additional requirements for working on Higher-Risk Buildings (HRBs).

It details the Principal Designer Building Regulations dutyholder's areas of competence as:

- Appropriate behaviour - includes refusing to carry out work which is beyond their skills, knowledge, or experience.
- Knowledge of legislative and regulatory framework for compliance
- Management of design work compliance
- Awareness of technical framework for compliance

Principal Designer Building Regulations (PDBR) Competence

PAS 8671 states that the focus of the PDBR dutyholder role is on design work compliance. In the PAS, the individual managing the dutyholder functions, either a designated individual for organisation or an Individual PDBR, is referred to as a PDBR because the competency standards for both a designated individual or an Individual PDBR will be largely the same.

Minimum competence requirements

To meet the minimum competence requirements of the Principal Designers Building Regulations (PDBR) must be able to:

- apply the legislative and regulatory framework related to how Designers and design work meets legal requirements;
- apply general principles of management to plan design work compliance, and to manage, monitor, and coordinate Designers and design work in relation to compliance during the design phase;
- understand general principles of building design, general principles of construction, and the “core criteria for building safety” set out in BS 8670-1:2024 sufficient to:

1. Behavioural competence:

The individual must display behaviour consistent with their legal duties and a strong safety culture e.g. Include integrity, leadership, openness, accountability, collaboration, proactive safety culture, recognising and acting on any building safety concerns.

2. Legislative & regulatory knowledge:

Must understand, interpret, and apply relevant legislation and regulation e.g. knowing the structure, scope and purpose of legal instruments; being able to locate, interpret, and apply legal requirements relevant to design work; understanding how these frameworks apply.

3. Management of design work compliance

Ability to plan, manage, monitor and coordinate design work so that it complies with Building

Regulations e.g. Understanding project requirements; identifying and closing compliance gaps; managing changes; ensuring Designers' duties are met; monitoring, auditing and recording evidence of compliance.

4. Technical framework for compliance

Must understand the core technical principles, standards and criteria (e.g. hazard identification & risk control regarding fire safety and structural safety, building & change & risk management control systems) sufficiently to appraise and challenge design work for compliance e.g. The Principal Designer Building Regulations (PDBR) need not be a specialist in every domain (e.g. advanced structural or fire modelling) but must know enough to identify (understanding) when input from the design specialists is required and be able to interpret and integrate specialist inputs.

5. Additional competence for Higher-Risk Buildings (HRBs)

When projects are HRBs under the building safety regime, PAS 8671 adds additional expectations in all four domains (behavioural, legislative, management, technical) e.g. Deeper understanding of reporting, more rigorous risk evaluation, procedures to provide and record evidence specific to HRBs with more intensive oversight.

Therefore BS 8670-1:2024 sets out the core criteria for building safety competence (knowledge, skills, experience and behaviours) that underpin this role. Applying those principles, the Principal Designer Building Regulations must be able to:

- o appraise Designers' evidence of design work compliance.
- o manage and facilitate the process for Designers to achieve consensus that coordinated design work complies with applicable building regulations;
- o appraise and address Principal Contractors' comments affecting design work compliance.

The role requires more than being able to read the regulations, standards, and codes: you need to know what they mean so that you can deliver the role of PDBR and take all reasonable steps to ensure that the design, if built, would comply with Building Regulations.



Are you competent?

If you can demonstrate that you can achieve the standards set out in PAS 8671 in relation to the

building projects you wish to work on, you are likely to be competent.

You don't need to know all the requirements of the regulations, approved codes, standards, and codes but you do need to be able to find the requirements and standards that applies to the task in hand or at least know that it is the right requirements and standards when it is presented to you by a Designer. You need to be able to understand what the regulations, approved documents, design codes, etc. mean and require.

You also need to have the interpersonal and management skills to be able to manage a team of Designers and interface with both Clients and the Principal Contractors.

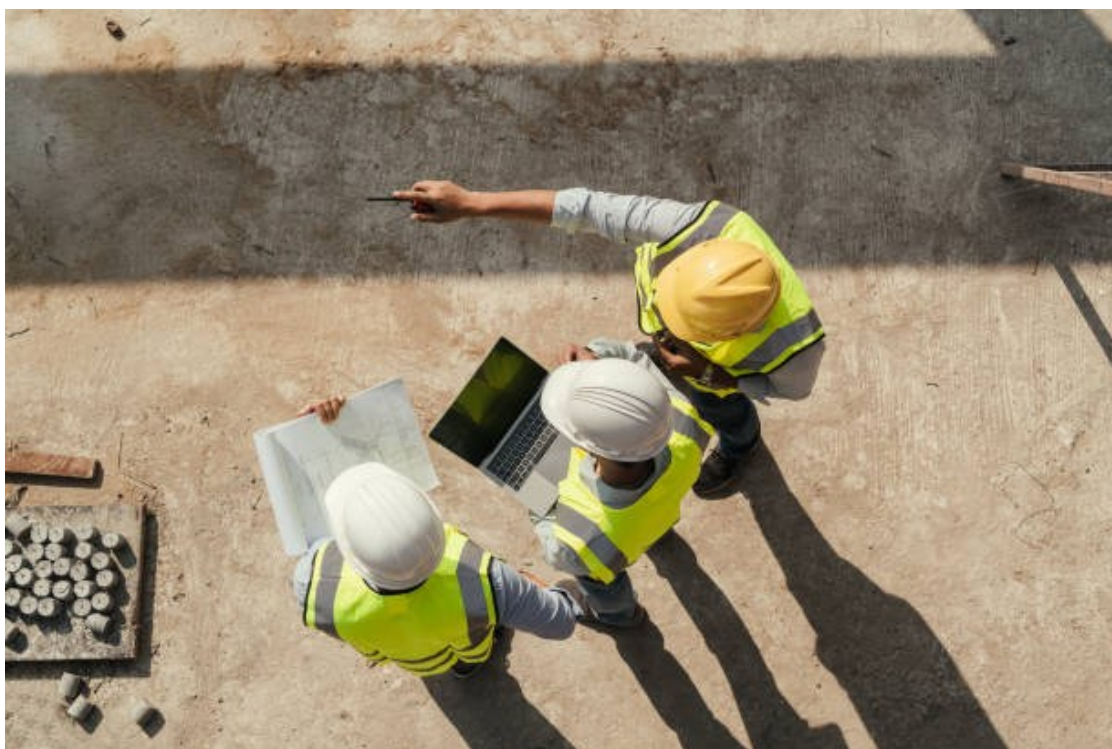
Perhaps the best way of determining whether you have what it takes to deliver the role of Principal Designer under the Building Regulations (PDBR) is to compile a portfolio of evidence that you can comply with the requirements of PAS 8671.

This portfolio will be essential to you when applying for inclusion in the APS Register.

Applicants are required to submit evidence of their professional experience in designing for managing building regulations compliance to demonstrate experience against the competence criteria set out in PAS 8671.

Interview

On receipt of applications the assessors will review the PAS 8671 narratives and supporting evidence and ask you questions to confirm your level of skills, knowledge, experience and behavioural competence to act as a 'PDBR for non- Higher-Risk Buildings' and or 'PDBR Higher-Risk Buildings (HRBs)'.



Joining the Register

[https://associationprojectsafety.sharepoint.com/sites/mdrive/shared documents/membership/applications & guidance/current pdbr register/pdbr guidance/aps pdbr application guidance scheme outline 04.2026.docx](https://associationprojectsafety.sharepoint.com/sites/mdrive/shared%20documents/membership/applications%20&%20guidance/current%20pdbr%20register/pdbr%20guidance/aps%20pdbr%20application%20guidance%20scheme%20outline%2004.2026.docx)

Eligibility

The APS competency scheme is relevant to individual Designers of all disciplines who are undertaking the role of Principal Designer Building Regulations (PDBR) in England and will be assessed against a competency framework based on PAS 8671 and, following an application, successful assessment, and interview will be included in a Register of competent PDs.

Any organisation which is the Designer responsible for a Building Control application in England, and where there is more than one Contractor as defined in the amendment to the Building Regulations needs to ensure that they have competent PDBR to undertake this regulatory function.

You are not required by APS to have undertaken specific training to acquire the skills, knowledge and behaviours needed in the PDBR role.

The Register

The APS Principal Designer Building Regulation (PDBR) Register is open to members and non-members of the Association.

This scheme will be of interest to APS Members who are also members of a professional design institute or trade association and already assessed by APS as competent to deliver CDM 2015 statutory dutyholder roles and non-statutory support / adviser roles to CDM Clients and dutyholders.

The APS PDBR Register is open to non-members.

All design work requiring a building control application and where there is likely to be more than one Contractor requires a PDBR to be appointed. The APS register will include sections for competent Principal Designers who have been assessed for non-Higher Risk Buildings and Higher Risk Buildings.

“Reasonable steps”

The APS PDBR Register allows Clients searching for a PDBR organisation to check that their chosen firm has the appropriate competent staff for their project. This means Clients can demonstrate they have taken the reasonable steps the law demands to ensure the people they appoint are competent.

The APS PDBR Register also allows Clients searching for a PDBR for a Higher-Risk Building (HRB) to check that the chosen individual has fulfilled the additional competence requirements of that role. When making an application for Building Control Approval a client must take reasonable steps to ensure that the PDBR fulfils the requirements of 11F (1) and (2) of the 2010 Regulations and must keep a record of those steps taken

Assessment Procedure – Summary

You are assessed against the Register assessment criteria in two stages, following receipt of your application.

The APS PDBR application form, including your personal details, qualifications and CPD Record and including written statements in relation to the 4 core elements of PAS 8671, with evidence to demonstrate your skills, knowledge, experience, and behaviours in relation to the Principal Designer Building Regulations (England) role.

Assessed elements of an application (please refer to Application Form)

Written submission:

The narrative should be no more than 500 words in each of the following categories:

- Management of design work compliance.
- Behavioural competence.
- Knowledge, understanding and experience of the legislative and regulatory framework for compliance.
- Knowledge, understanding and experience of the technical framework compliance.

Evidence: examples of work undertaken of working in building regulation compliance.

Competence assessment interview on ZOOM/TEAMS to confirm the evidence provided. You will be assessed as 'Principal Designer Building Regulations' for Non-High-Risk Buildings or 'Principal Designer Building Regulations Higher-Risk Buildings'. or both



Assessment of Applications – Process

On receipt of the applicants' application it is reviewed by APS Membership administration, who make recommendations to the Head of Membership. If the application appears complete – i.e. applicant details and qualifications together with evidence has been provided – APS administration will pass the complete application to the assessors. Where there is concern that any aspect of the application is deficient the APS administration will refer to the Head of Membership to review the application. APS Administration will not carry out a technical check of evidence provided.

In all cases, where the application is deficient the APS administration or assessor will advise the applicant and further information will be requested.

The application will be allocated to a lead assessor, who will assess the application and come to a conclusion based on the two options below. Once a conclusion is reached the assessors assessment will be passed to a second assessor for ratification.

[https://associationprojectsafety.sharepoint.com/sites/mdrive/shared documents/membership/applications & guidance/current pdr register/pdr guidance/aps pdr application guidance scheme outline 04.2026.docx](https://associationprojectsafety.sharepoint.com/sites/mdrive/shared%20documents/membership/applications%20&%20guidance/current%20pdr%20register/pdr%20guidance/aps%20pdr%20application%20guidance%20scheme%20outline%2004.2026.docx)

The two Assessors can form one of two judgements:

1. The applicant has demonstrated that they meet the basic criteria (based on experience and qualification etc), and the applicant has met the evidence-based competency requirements in line with PAS 8671, or
2. The applicant has not demonstrated that they meet the competence criteria.

In the case of 2 above the Head of Membership will provide a summary of the reasoning behind the Assessor's decision. APS administration will advise the applicant and provide a copy of the appeal procedure.

Competence Criteria met and applicant accredited

The APS Administrator verifies the applicant's details on the appropriate Register on the APS IT system. The registers are searchable by Clients (members of the public).

Criteria Not Met

The Lead Assessor informs the applicant, outlining the Assessors reasoning and inviting them to provide additional evidence or other information (e.g. proof of PI Insurance) as indicated in the Assessors report.

Insufficient Information

The Lead Assessor will inform the applicant, outlining the additional information required and advise that if such information is not provided within 3 months, then the application will be deemed as "Criteria Not Met" and rejected.

Inclusion in the Register

Figure 1 illustrates the various routes to approval as an Accredited Competent Principal Designer Building Regulations meeting the requirements of PAS 8671 and The Building Regulations etc. (Amendment) (England) Regulations 2023.

The processes underlying accreditation are common across each building typology, and it is important, regardless of the previous experience and particular skill set of the Accredited Principal Designer Building Regulations (PDBR), that they have met a common threshold with regard to understanding the competence requirements relating to Building Regulation compliance.

The basic principles of demonstrating competence for alterations, extension, conversions and new builds are the same based on PAS 8671.

To achieve the 'Principal Designer Higher-Risk Buildings' level of competence under the Register, you must have experience of working, or shadowing work, on Higher-Risk Buildings as part of, or in collaboration with, an organisation providing the PDBR or Lead Designer BR roles.

Appeals

In the event of an applicant wishing to appeal against failure to meet the APS requirements, they may lodge an appeal which will be considered by an independent assessor (non -APS member from a compatible PDBR Assessment scheme) A separate appeals procedure is available to download from the APS website.

Additional competency – Higher Risk Buildings

Applications from registrants on the non-HRB register can be made when that individual believes that they have evidence to support an application for inclusion in the HRB register.

Removal from the register

This will occur when there are breaches of the APS Registrant's Code of Conduct, criminal activity, bankruptcy etc.



PDBR APPLICATION PROCESS

