

Stop dumbing down to satisfy CDM

Giving non-architects power to influence design in the name of safety has diluted creativity. It's time for architects to embrace "CDM differently"



Paul Bussey

+ The most significant change in CDM 2015 was the new "principal designer" (PD) role to be in control the pre-construction phases, matching that of the principal contractor (PC) in the project execution phase. Unlike the now supplanted CDM coordinator (CDM-C), the PD is not generally a person but a corporate role. Long term, the HSE's intention is to have active lead designers, ideally already on the project, carrying out their designer duties but also taking on the CDM integration of other designers.

On a nuclear power station, pharmaceutical factory or infrastructure project, it makes sense to appoint a PD that has the skills, knowledge and experience (SKE) to deliver such engineering-based projects. On architectural projects, it is of similar importance to appoint a PD that has the SKE's to deliver the complex mix of aesthetic and technical designers' duties in such projects.

However, largely due to historical misrepresentation of the 1994 and 2007 CDM Regulations by certain sectors, designers have been encouraged to shy away from "the responsibility" of taking on a health and safety role. A tick box, checklist and the "what if I miss something?" culture has subverted what was intended as an embedded day-to-day architectural process role into a risk-averse paperwork-based, bureaucratic external role.

Safety by spreadsheet

While the CDM-C role was perceived as successful by some, it largely consisted of challenging designers' proposals and asking for the ubiquitous but unnecessary "designer risk assessment" (DRA) documents from all designers. These were simply "coordinated" into larger DRA spreadsheets, and the significant factors were lost among the myriad routine risks and the search for "the safest solution".

This approach was fuelled by misinterpretations of the "general principals of prevention" laid down in the Management of Health and Safety at Work Regulations, and the "hierarchy of control measures" under the Working at Height Regulations, whereby safety procedures intended for manufacturing and work on

construction sites have been misinterpreted for the conceptual design process.

Thus, the assumed need to "eliminate" risk has been interpreted as getting rid of creative design concepts because they are "too unsafe". Should this thinking have been applied in history we would surely not have our great world heritage architecture: Florence's Duomo (below) or St Paul's Cathedral. Furthermore, the misapplication of the need to "reduce" risk where it cannot be "eliminated" has led to a continual diminution of design intent in the name of safety.

This process has been exacerbated by attitudes that paint designers as arrogant and

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ill-educated in health and safety, or having complete disregard for the health and safety of the building's occupants or the site's operatives. The fact that architects have a rigorous academic and industry training programme of at least seven years, including a proportionate amount of CDM-related training, is missed.

Professional architects achieve a high standard of design understanding that incorporates structural and services integration, sustainability, town planning criteria and building

regulations compliance. Any gaps are filled by additional CPD, training or advice from outside experts, which is then assimilated into the overall design. This can be done effectively by an active designer in control of the design

To address this, we developed "CDM differently", where lead designers incorporate the significant health and safety issues into the architectural project's design concept from the start. Site hazards are identified early and captured on site drawings, clearly highlighted among other site details, such as input from the client, statutory authorities and other consultants. The combination of site knowledge, client brief and design aspirations are synthesised, along with CDM issues, to achieve a "tolerable level of risk".

To facilitate clear, collaborative information, CDM differently discourages narrative text in favour of annotated drawings, sketches, photographs and diagrams to show the significant issues and their context. Risk tolerability is established and noted for future reference during re-design or value engineering, or an audit or HSE inquiry.

This encapsulates the concept of "reasonable foreseeability and practicability" and, if genuinely employed and recorded, is acceptable to the HSE and courts. CDM differently is a common sense, collaborative process, carried out by architects with sufficient SKE or extra training from the RIBA.

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