



Working Group on Maintenance of Tenement Scheme Property

Final Recommendations Report





Foreword



Housing affects all of us. After all, we all have to live somewhere.

But it gets precious little attention in the media unless things go wrong.

As someone who used to work in the media I have always thought that's a real shame.

One time when something went wrong was in June 2000.

Christine Foster, an Australian, was working in an Edinburgh city centre pub when masonry fell from the roof, through an awning, and hit her. She died from serious head injuries. She was just 26.

Christine's father, Michael, called on the government to lay down tougher regulations to help ensure safer construction in Scotland.

Very little has happened since to ensure that buildings, such as the one involved in that tragic case, are maintained properly; evidenced by recent figures from the City of Edinburgh Council that indicated over 20 reported incidents of falling masonry every month.

We know from the most recent housing condition survey that 68% of all dwellings have some degree of disrepair. Disrepair to critical elements stood at 50%, while 28% of dwellings had some instance of urgent disrepair, and 5% had some extensive disrepair. These figures have not moved in a year.

Nearly a fifth of all our housing is pre-1919 – that's 467,000 homes – and 68% of those have disrepair to critical elements, and 36% have critical and urgent repair needs.

This is why MSPs of all parties started to discuss the issue of tenement maintenance over a year ago.

We decided to set up a working group of ourselves and experts in the field to come up with proposals for government.

Ben Macpherson MSP was its first convenor, before his promotion to being a government minister, and then I took over the role.

I led a debate in the parliament on this issue last May, and the Housing Minister, Kevin Stewart MSP, agreed that a review should be carried out of relevant existing legislation, and of how tenement housing in Scotland could potentially be better maintained and enhanced.

Our proposals are challenging, but it is vital that government acts on them.

They won't be universally popular, but taking action now is the right thing to do.

Graham Simpson MSP

Commentary from MSPs

Alex Cole-Hamilton MSP

“Housing is of the utmost importance in every constituency. I have been fortunate enough to have experienced living in a variety of property types, including in flats for over sixteen years; but I have also been unfortunate, as have others, in trying to have necessary common repairs carried out. As policymakers, it is our duty to concentrate our minds on building integrity, property repairs, upgrades and the dire need for safety checks. To this day, however, there remains no mechanism by which to ensure the maintenance of tenements is carried out to the appropriate standard. The result of this being that it is left to individuals to sort out the works themselves. This is something I come across in my own constituency, is utterly unjust, and cannot continue.

I am really glad that this whole process has been done on a cross-party basis. The group is encouraging as it can be a stimulus for showing the Scottish Government what can actually be done to deal with Scotland’s tenement housing stock. I hope that the Scottish Government will take this opportunity to support our proposals and act swiftly to preserve our built world.”

Daniel Johnson MSP

“Tenements define a large part of the housing landscape in south Edinburgh, as they do across large swathes of the city. I don’t think there is any doubt that they form part of the essential character of the city that make it so appealing to residents and tourists alike. That’s why the issue of maintenance is so important. Constituents continue to contact me regarding essential repair work that needs to be carried out but which, for any number of reasons, is proving difficult to organise. Those conversations make one thing crystal clear to me. The current situation cannot continue. Simply put, as it stands right now there is no requisite mechanism to organise works to maintain tenements to the necessary standard. Too often it is left to individuals to try and organise works, and sometimes be left severely out of pocket in the process. We need a system that protects the fabric of this city and that works for local residents.

It’s why being part of the working group, on a cross-party basis, has been so important. I hope that the work of the group will lead to real and positive change for my constituents and those living in tenements across the city.”

John Mason MSP

“My own constituency of Shettleston in the East End of Glasgow includes many tenements – both of traditional sandstone and of post-war construction. Those under the management of housing associations are generally in good shape and regularly maintained. However, those in private ownership are a real mix. Some are well looked after; but others have no factor and residents cannot agree amongst themselves to get repair work done; still others do have factors, but they are powerless to carry out maintenance in the face of owners’ unwillingness or inability to pay. The estate where I myself live consists of 270 flats which won an award when they had a major refurbishment about 1990, but virtually no maintenance has happened since then. Our properties are gradually deteriorating, and the factor seems powerless to do anything. I carried out a survey of the owners, but few seemed to feel there was any problem. Something has to change.

I am delighted that we have been able to carry out this work on a cross-party basis. Any element of compulsion on owners could prove to be unpopular. But somewhere along the line, we need to grasp the nettle.”

Andy Wightman MSP

“Around two-thirds of dwellings in Edinburgh are flatted, and it is inevitable that when I meet constituents our conversations turn to the deteriorating quality of tenement properties. But we used to do things a little better. Until the early 1980s, the council used to inspect tenement property across the city. Regrettably, however, the systems we had to ensure proper refurbishment and maintenance have been lost.

With appropriate care and preservation, tenements that have dominated our urban environments for over a century, should be maintained for many more centuries. They are a fundamental part of our public realm and should be treated as such. Yet, this debate has for too long been framed by private interests that have triggered a decline in the upkeep of our shared property and public infrastructure.

As legislators, we need to review the highly unsatisfactory state of affairs that confronts far too many people on a daily basis. This is a welcome publication and I commend the efforts that the Working Group have made to improve our tenements. It is now up to the Scottish Government to respond to these proposals and support our joint call to preserve our built environment.”

Definitions

Throughout this report are references to “tenements”, and “scheme property”, or words to that effect.

For clarity, the report considers a “tenement” as defined in section 26 of the Tenements (Scotland) Act 2004; namely a building or part of a building which comprises at least two related flats which are, or are designed to be, in separate ownership and are divided from each other horizontally. A tenement can include both commercial and residential properties.

Furthermore, the working group used the definition of “scheme property” in rule 1.2 of the Tenement Management Scheme in schedule 1 to the 2004 Act. Broadly, this means the parts of the building owned in common, such as the close; and other key parts, such as the roof and external walls.

Explanatory note on recommendations

The recommendations are interlinked. While each recommendation has its own benefits, the required transformative change to improve the fabric of Scotland’s tenement property can only arise through the implementation of all three.

Whilst Government should introduce policies rewarding “best practice”, the three recommendations will require legislative change which should, ideally, be carried through the parliamentary stages concurrently. It is possible, however, to introduce recommendations around Building Reserve Funds and five yearly inspections prior to the owners’ associations; but that approach could weaken the drive for improved maintenance.

The recommendations contained within the report have arisen through cross-party working and extensive stakeholder engagement. They are broad, and the working group specifies where further detailed investigation is required for issues of detail.

Existing support

In addition to the 2004 Act, the group recognises the benefits and contributions to the issue from existing policy, pilot schemes and funding, such as the Equity Loan Scheme; which is currently available in some, but not all, local authority areas.

Furthermore, any council in Scotland is able to use its “missing shares”¹ powers when one or more owners are unwilling or unable to pay; the owner cannot be found; or it is unreasonable to ask an owner to pay for communal maintenance. In these instances, the council pays for the owner’s share of the cost of the required maintenance works to the shared communal

¹Introduced by Section 50 of the Housing (Scotland) Act 2006

areas, and then recovers the expenditure from non-contributing owners subsequently.

The Group are also aware of local pilot schemes – such as the Traditional Buildings Health Check (TBHC), delivered by Stirling City Heritage Trust. BEFS understand the evaluation after five years to be positive and the project is continuing. As such, this Working Group believe the pilot, and other similar schemes, should be rolled out nationally.

Finally, the Working Group recommends the introduction of these recommendations is supported by fiscal initiatives – such as repairs having VAT parity with new build.

The role of grants and loans

Regardless of owners adopting better financial planning for repairs, there are always going to be situations where the cost of repairs is greater than the owner can afford and where there is too little equity in the property to enable loans to be obtained. Where equity is available, there is a role for financial institutions to lend – including the Building Reserve Global Fund. Other solutions requiring public finance will include:

- missing shares
- outright grant
- mortgage to rent.

These cases where repairs are uneconomic will occur both singly, according to owner circumstances, and spatially. There will be whole streets where property values will be too low to make repairs economic. Housing Action Areas for improvement or demolition will be the answer in some areas.

Energy efficiency

It is recognised that one of the most immediate, and effective, ways to improve energy efficiency is to keep a building repaired.

The proposals in this report are designed to support that aim. However, armed with improved organisational capabilities and with repairs under control, owners will be in a better position to consider communal energy efficiency schemes such as external wall insulation and the installation of renewables.

Tenements are physically well suited to such measures which could even work across whole terraces or developments providing benefits of scale. This is also why it is important to find ways for owners’ associations to work together on jointly procured projects. Furthermore, this could go some way to assisting the Scottish Government reach its ambitious energy efficiency and climate change targets.

Recommendations

1. Building inspections

The "scheme property" of all tenements should be inspected every five years and a report prepared that will be publicly available to existing or prospective owners and tenants, neighbours and policy makers.

This will allow them to see what condition each building is in, how much expenditure is required to bring it up to standard if it is defective, and what needs to be done by way of ongoing maintenance.

Inspections should be undertaken by qualified building professionals; specifically:

- a chartered building surveyor (MRICS – through building surveying pathway), or
- a qualified architect (member of RIAS or recognised professional body in the UK e.g. RIBA)

These professionals should be members of their respective bodies and:

- have appropriate training and experience;
- be regulated by a professional body with appropriate professional indemnity insurance (PII);
- abide by a code of professional conduct;
- have a mandatory commitment to Continuous Professional Development (CPD); and
- have access to redress/ombudsman.

A training or accreditation scheme could be developed for suitably experienced people who are not chartered building surveyors or architects in the future. However, the aforementioned requirements are essential to ensure professional standards and public safety, and should be mandatory.

For 'A' listed buildings, the professional should be accredited in accordance with a recognised conservation accreditation scheme through RICS or RIAS.

Inspection procedure and content

Once appointed by the owners' association, the professional should arrange a pre-site visit to advise on the inspection requirements – such as access to roofs and concealed parts – and to make other necessary arrangements.

The appointed professional should inspect in the tenement in accordance with the relevant British Standard Guide (BS 7913:2013). The roof must be inspected – either physically or with a drone. If energy efficiency and fire safety measures are included as "Scheme Property" in the title deeds, then their inspection would be included in the survey.

In future, there is scope for the inspecting professionals to provide advice on the installation of energy efficiency improvement measures, or fire safety measures that comply with legislation or Government policy.

Maintenance should be managed, professional inspections undertaken, and reports prepared in accordance with BS 7913:2013, Annex B, pp 31-33 "Conservation Manuals, Logbooks and Five-yearly Inspections".

The form and layout of the Inspection Report should be as set out in BS 7913:2013, with further investigations and works prescribed under the following categories:

1. Immediate
2. Urgent
3. Necessary
4. Desirable
5. No reportable defect.

As per home report practice, the qualified property professional will share a draft inspection report with the owners' association for review and discussion. Following agreement, by the owners' association and the professional, the report will be considered "approved".

Following approval, all home owners will receive a copy of the report – either hard or electronic copy.

The report will contain the inspection conclusions, provide indicative costings for remedial work and any grants available for such works.

The professional must never recommend specific contractors to undertake recommended or advised works.

Inspection reporting and recording

The report will be a live document, updated on a regular basis by the owners' association (acting as a log book), and will be held on a national, online register, and publicly accessible without charge.

The Scottish Land Information Service (ScotLIS) should

present all tenement inspection reports. However, further exploration on details of the online register is required.

The content of the tenement inspection report will supplement the information contained within Home Reports, by providing vital intelligence for any prospective purchaser of a tenement unit.

Accordingly, the tenement inspection report should be linked to the Home Report; this will require legislative change and should be subject to further public and professional consultation – particularly on the effect of existing practices and procedure.

The production of an updated inspection report should take place at minimum intervals of five years.

Enforcement

Enforcement of inspection reports could be a complex task given the number of tenements in Scotland.

Production and 'uploading' of the tenement inspection report should provide sufficient notification of inspections being carried out.

Furthermore, given the reports will be linked to the home report, anyone wishing to sell their property within a tenement will be unable to do so without a tenement inspection report.

The group, therefore, recommends that after a transitional period, a tenement flat or building cannot be sold or let without the existence of a tenement inspection report.



2. Establishing compulsory owners' associations

In our Interim Report in January 2019, the group initially recommended that a revised version of the Tenement Management Scheme (TMS (B)) – as described in the Scottish Law Commission Report on the Law of the Tenement (Scot Law Com No 162, 1998) – would provide a suitable model to establish an owners' association as a corporate body.

On reflection, however, we think that we should have more clearly defined "Owners' Associations" in that report, as there are considerable differences between what is proposed and associations as they exist now.

The group continues to believe that owners' associations are an essential element of tenement maintenance by providing

leadership, effective decision-making processes and the ability of groups to enter into contracts.

There are, however, complex policy and technical issues in introducing legislation to set up the owners' association model, primarily because of the interaction with the property titles i.e. the legal terms under which ownership is held.

There are also Human Rights issues that need to be investigated. The group did not see these as insurmountable difficulties, but recommend that this issue is referred to the Scottish Law Commission for further development because the details in the legislation need to be right.

Current owners' associations	Enhanced owners' associations	Impact of proposals
No legal personality ²	Legal personality	Greater protection for owners who might otherwise be held individually responsible for the whole group's debts. Can enter into contracts as a legal person – at present, a building professional or contractor would contract with each individual owner.
	Annual meeting mechanism	Provisions prevent absent or apathetic owners holding up repairs.
Control exerted on a step by step basis	Control exerted over development of an annual repair plan and budget. Empowered manager with agreed delegation	One set of decision-making makes property management easier, more effective and more efficient. This should result in lower admin costs being paid by owners.
	Manager has power to pursue non-paying owners	Analysis of owners' stories suggests that fewer than 1 in 10 owners are willing to pursue other owners through the courts with the result that necessary repairs are not tackled, property conditions worsen, and social cohesion within the tenement is adversely affected.

²This excludes the small number of Owners' Associations that have been established under the Development Management Scheme (DMS), which has been available since 2009, but in practice is only used in new larger developments.

It is therefore suggested that if individual owners' associations are to be permitted to hold funds, this should be subject to strict safeguards, such as:

- no investment allowed beyond straightforward interest-bearing accounts; and
- these should only be permissible in developments where there is a fully accredited and registered property factor in management with control of the account.

The group agreed that the Building Reserve Fund (BRF) could be used for maintenance – as defined in Schedule 1 of the 2004 Act – including repairs and replacement, the installation of insulation, cleaning, painting and other routine works, gardening, the day to day running of a tenement and the reinstatement of a part (but not most) of the tenement.

Further work is required to establish the central parameters of this fund:

- how withdrawals from the fund are governed;
- how the fund would manage investment in order for it to grow in line with increasing repair costs;
- in what circumstances it could make loans to contributing owners to allow them to proceed with repairs where savings are not sufficient to cover identified repairs; and
- the ability of the fund to offer other member services; for example, block common insurance policies, owner-manager indemnity insurance, and escrow accounts.

Recommendation

Finance professionals should be convened to develop the fund structure and practice. This could include professionals within the banking and finance industries, representatives from Credit Unions, other existing deposit schemes, and housing association finance officers.

BRF contributions

Statutory guidelines should set out the minimum payment each building needs put into a BRF every year. The guidelines should be based on the assessed repair risk for that type of building and extent of common responsibility. There should be a transparent points system based on, for example, the:

- age of the building;
- number of individual units;
- presence of communal facilities (lifts, large areas of landscaping, roads etc); and
- building type.

Most of these factors can be ascertained from Registers of Scotland (RoS) and cross-checked at the first sale by the chartered surveyor carrying out a Home Report.

It is proposed that research should be conducted to assess

the impact of these factors on repair costs and to propose a suitable points system. Further research will also be required to identify what the initial minimum contribution should be and how it should be rated across the points system. It is anticipated that the initial minimum contribution should be set by Scottish Ministers.

Central or local government should have powers to vary the contribution levels to ensure they rise in line with repair costs and to gradually increase contributions both as owners become accustomed to saving, and as funds become more important in valuing properties.

Consultation will be required to determine whether the power to vary contribution levels would be more appropriately held at national or local level.

In all cases, however, owners' associations should have the ability to make contributions in excess of the statutory figure if the owner's association wishes to do so.

Interaction between owners' association and BRF

Individual owner's contributions to the BRF should be set according to the provisions of the titles or default tenement law in terms of the 2004 Act (TMS) – if these require each owner to pay equal shares for common repairs then each owner will pay an equal contribution to the BRF.

However, the control of the fund will be exerted through the owners' association, once established, and subject to its decision-making procedure.



Owners' associations should not have powers to spend outside the communally owned building and grounds. However, the drafting of the legislation should empower owners' associations to work with others in the locality to be able to carry out, for example, back court improvements within a street block; or to allow a more efficient and effective programme of repairs to, for example, a wider group of buildings.

The working group believe that in instances where an owners' association cannot be established, or an existing owners' association fails, compulsory factoring would be the fall-back position.

This could be triggered by owners through, for example, appealing to the First Tier Tribunal (FTT) or by the local authority as enforcement action.

Compulsory factoring will be a more onerous task than standard property management as the manager will be working with a group of owners who cannot work together; there will be no system of delegations and no forward planning.

As such, standard management should certainly cost less than compulsory factoring. This is in itself will be an incentive to owners to work together effectively.

Recommendation

The group recommends that the Scottish Law Commission is asked to consider the introduction of compulsory Owners' Associations in tenements.

3. Establishment of Building Reserve Funds

The core of the original proposals was that Building Reserve Funds (BRF) should be held in a specially established national or regional level fund, in the form of a social investment fund. Safe Deposits Scotland was used as an example, but a Credit Union structure could equally be suitable.

However, it is accepted that some residents' associations will already have, or will want to establish and control, their own building maintenance accounts.

Comparing the two, it is felt that a central fund has many advantages over an owners' association-held fund.

	Central Fund	Owners' Association-held Fund
BRF could be set up without having an owners' association	Yes	No
Accountability / governance and control	Good	Harder to prevent fraud and misuse
Protection against owners' association going defunct	Good	Potential for loss
Central recording of contributions/ transparency	Good	Poor
Ability to invest funds	Relatively safe with professional management. Regulation possible.	
Ability to make loans to owners whose funds are insufficient for required repairs	Possible	
Ability to ensure use for long-term maintenance	Good	
Ability to ensure funds are heritable (transmittable to next and subsequent generations of owners)	Good	

Introduction timetable

It is estimated that a 10 year time scale is required to introduce all the legislation discussed. This takes into account the 4-5 year period where the Scottish Law Commission examine and consult on the owners' association proposals. However, it is not necessary to wait until this part of the process is complete to introduce legislation covering the other proposals.

Ideally, the proposed central fund to hold the BRF contributions would be in place by the time a DMS is made compulsory for new-build tenements, and therefore also be compulsory for such developments from that time. This would effectively create a pilot phase for wider introduction of BRFs on a phased basis.

The introduction of mandatory inspections may also require phasing in, or adequate lead in time, in order to allow testing

of software or expanding the pool of people qualified to undertake property inspections.

This relatively lengthy period will also allow the property market to come to terms with the impact of the proposals, which will reduce any negative impact of a greater consideration of repair condition in property values. A degree of culture change could also be expected to occur as repair conditions take a much higher prominence in the news and through consultation over proposals.

Given this time period, and critical state of many tenements in Scotland, the group recommends the extension of pilots and schemes to a national level for those exemplifying best practice.

Year	Legislative Activity	Research activity	Policy Development Activity
2019	Report launched and debated in Parliament		
2019			Conference to gather and collate queries to aid investigation into challenges and assist planning
2020		Finance professionals' investigation into BRF and Social Investment Funds.	Scottish Law Commission instructed to commence investigation on Owners' Associations in Tenements (4/5 year initiative)
2020			Inspection process and procedures planned
2020	Public Consultation launched on less complex legislative provisions		
2020		Safe Deposit Scotland (or other suitable body) asked to prepare pilot / trial of BRF	
2021	Less complex legislative provisions, including making DMS and BRF compulsory in new buildings		
2021	Pilot launched – voluntary developments to undertake inspections, owners' association and BRF		
2023-2024	Act written – revisions influenced by information from SLC and Pilot		
2025	Act put to Parliament with phased implementation inclusions		
2026			Questions about establishment of owners' associations, property inspections and BRFs added to landlord registration documents, and Home Reports etc



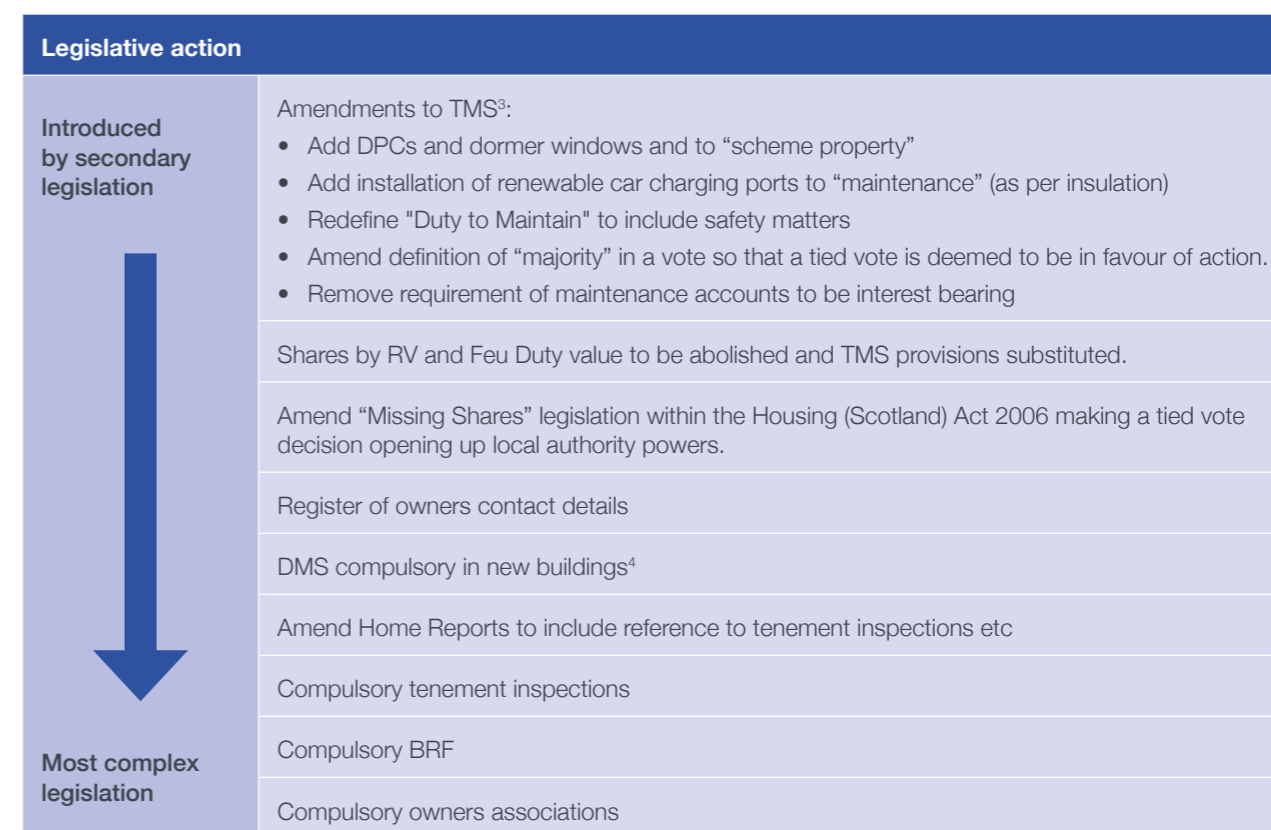
Complexity of legislation

The majority of this report’s proposals require legislative action. Some may simply require secondary legislation and could be introduced relatively quickly; whilst other proposals – those which are more straightforward – might be included in related legislation dealing with, for example, planning, finance or energy.

As suggested above, the legislation introducing compulsory owners’ associations is likely to take the longest as the interaction with existing title provisions needs to be carefully investigated.

The following diagram shows the degree of complexity of the proposals made in this and previous papers with the most easily introduced provisions at the top and the most complex at the bottom.

It is important to note that all of these recommendations can, and do, exist voluntarily. Before any legislation is made, it is possible that owners may wish to pursue actioning these proposals. We would urge the Scottish Government to recognise these actions as “best practice” and provide incentives and reward for groups of owners who take measures to improve their scheme property.



³ With the exception of the removal of the requirement for maintenance accounts to be interest bearing, all the proposed changes to the TMS were discussed in the interim report. We have recently become aware that owner groups are having great difficulty in setting up bank accounts. Partly this is because the legislation requires owner groups to use interest bearing accounts and partly because of money laundering regulations.

⁴ As the DMS has already been legislated for, it would be relatively simple to make it compulsory for specified new buildings, although clearly this would require consultation.

Further research and actions

This report recommends further action and research is undertaken on various aspects of the proposal. These include:

- Scottish Law Commission to research into Tenement Management Schemes.
- Use of ScotLIS as the holder of all tenement inspection reports.
- Connection between the Home Report and Tenement Inspection Report.
- Inclusion of advice on the installation of energy efficiency and fire safety measures in the Tenement Inspection Report.
- Research should be conducted into the establishment and parameters of BRFs, and an assessment of the impact of the proposed points system.
- Further research into required to identify what the initial minimum BRF contribution should be, how it should be rated across the points system, and whether local authorities should have powers to vary local contributions.
- Government should recognise "best practice" and provide incentives and reward for groups of owners who take measures to improve their scheme property.

Explanatory note and further information

This report provides an overview of the final recommendations agreed by the Working Group.

The Working Group's Interim Report, further views and information on the legislative amends, and how the recommendations were reached can be found at:

www.befs.org.uk/policy-topics/buildings-maintenance-2/

Tenements are the most common house type in all occupation

Tenements account for 584,000 properties in Scotland – equating to **24%** of Scotland's total housing stock

Pre-1919 tenements account for **7%** of Scotland's total housing stock – the fourth most common property [of all types and ages]

29% of tenements were built pre-1919 [equating to 7% of all housing stock in Scotland]

68% of all pre-1919 dwellings have Critical Disrepair [Scottish Average: 50%]

36% of all pre-1919 dwellings have Critical and Urgent disrepair [Scottish Average: 24%]

5% of all pre-1919 dwellings have Critical, Urgent & Extensive disrepair [Scottish Average: 2%]

Paying for common repairs or maintenance causes most disputes in tenements

Key dates

November 2017: Graham Simpson MSP hosted a parliamentary reception regarding RICS tenement health check.

January 2018: the Scottish Parliament debated Ben Macpherson MSP's motion on Maintenance of Tenement Communal Property, which included the proposal for a cross party working group on the subject.

March 2018: Inaugural meeting of the Scottish Parliamentary Working Group on Tenement Maintenance, with Convenor and Vice-Convenors appointed.

May 2018: the issue of tenement maintenance was progressed in a Scottish Parliament debate on a motion on the inadequacy of existing legislation in dealing with the condition of Scotland's tenement housing stock and a vote in favour of a review of the relevant legislation.

August 2018: Scottish Federation of Housing Associations organised a visit to the offices of Dunedin Canmore for members of the working group. This included a short tour of tenements undergoing repairs in Edinburgh and learning about the challenges housing associations face in handling maintenance in tenements where they are not the majority owner.

January 2019: Interim report of the Scottish Parliamentary Working Group on Tenement Maintenance published.

January 2019: March 2019: Stakeholder and Public Consultation on interim report recommendations.

June 2019: Full recommendations report published.

Members of Scottish Parliament

Graham Simpson MSP, Convener
Daniel Johnson MSP, Vice Convener
Andy Wightman MSP, Vice Convener
Stuart McMillan MSP
Maureen Watt MSP
Jeremy Balfour MSP
Gordon Lindhurst MSP
John Mason MSP
Stuart McMillan MSP

Individuals and organisations

BEFS, Secretariat
RICS, Secretariat
Scottish Federation of Housing Associations
Glasgow and West of Scotland Forum of Housing Associations
Property Managers Association Scotland
Tenement Action Group
RIAS
Scottish Association of Landlords
Citizens Advice Scotland
City of Edinburgh Council
Existing Homes Alliance
Professor Douglas Robertson
Dr Andrew Steven
Andrew Milne MRICS





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