Our ref: CS30858700

The Chief Planning Officer
City of Edinburgh Council
Business Centre G.2
Waverley Court
4 East Market Street
Edinburgh
EH8 8BG

BY TRACKED EMAIL

21st January 2026

Dear Sir/Madam,

NOTIFICATION UNDER PART 20, CLASS 67 OF THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (SCOTLAND) ORDER 1992 (AS AMENDED) AND NOTIFICATION UNDER THE ELECTRONIC COMMUNICATIONS CODE (CONDITIONS AND RESTRICTIONS) REGULATIONS 2003 (AS AMENDED) TO UTILISE PERMITTED DEVELOPMENT RIGHTS AT CS30858700 –MOAT HOUSE FLATS, MOAT DRIVE, HUTCHINSON, EDINBURGH, EH14 1NS, (NGR: 322663E, 671847N).

Cornerstone is the UK's leading mobile infrastructure services company. We acquire, manage, and own over 20,000 sites and are committed to enabling best in class mobile connectivity for over half of all the country's mobile customers. We oversee works on behalf of telecommunications providers and wherever possible aim to:

- promote shared infrastructure
- maximise opportunities to consolidate the number of base stations
- significantly reduce the environmental impact of network development

Please accept this letter and its enclosures as a notification in accordance with the above Regulations

Cornerstone intend to utilise permitted development rights as identified in Part 20, Class 67

This letter provides formal notification in writing, 28 days notice in advance, of the intention to install electronic communications apparatus

For the avoidance of doubt this letter does not constitute an application for planning permission or prior approval. No fee is required for the notification.

The proposal is to install electronic communications apparatus/development ancillary to radio equipment housing on behalf of Cornerstone.

Description of Development:

The proposal includes the installation of 6no. antennas mounted on 3no. 4.1m high tripods at the height of 30.2m AGL, the installation of 2no. 0.3m dishes and associated ancillary equipment; the installation of 1no. cabinet on new freestanding frame and works ancillary thereto on the rooftop of the building.

For the avoidance of doubt this letter does not constitute:

An application for a determination as to whether the prior approval of the Authority will be required to siting and appearance;
An application for planning permission; or
A request for pre-application advice

The proposed upgrade comprises:

The proposal includes the installation of 6no. antennas mounted on 3no. 4.1m high tripods at the height of 30.2m AGL, the installation of 2no. 0.3m dishes and associated ancillary equipment; the installation of 1no. cabinet on new freestanding frame and works ancillary thereto on the rooftop of the building.

There is an existing shared site on Gorgie Park Road which currently serves the area. Following technical consideration of the site, it has been concluded that the existing site is unable to accommodate new 5G equipment and it would require a completely new mast. A replacement pole cannot be located within the footprint of the existing monopole due to structural constraints and the presence of underground services in the pavement, as well as the need to maintain the stability of the mast's foundations. For these reasons, identifying a new site is considered the most appropriate solution in terms of visual amenity.

As such, it is necessary to site a new installation in close proximity to the existing which is able to provide continuous coverage to the cell area and replicate the existing coverage pattern. It is important for a new base station to be as close as possible to the existing, to ensure continuity in coverage. Where continuity in coverage is not a
additional installations are required to address newly created gaps in coverage. Therefore, it is most efficient to site a new mast in close proximity to the existing, to prevent the proliferation of telecommunications equipment within the locality.

In this instance, a rooftop installation has been proposed as the most viable solution to meet the demand for coverage. The height of the rooftop is integral to providing the best possible levels of coverage to the local area by allowing clearance of local clutter such as buildings and trees and has been selected following an external design visit informed by technical data.

The rooftop location has also been selected with consideration to appearance in order to minimise visual impact - the proposed equipment has been kept to a technical minimum whilst allowing reasonable consideration of future requirements in line with the NPPF.

In terms of design, the antennas are proposed to be mounted on the rooftop using galvanized antenna support structures and tripods which provide bracing and support for the antennas on the rooftop.

The number of antennas required is dictated in part by the amc
that need to be deployed to the area for both operators. In this case, this site would provide enhanced 4G and new 5G coverage to the locality.

The antennas are proposed close to the rooftop edge due to technical constraints. Given the height of the building, the antennas need to be sited much closer to the building edge to avoid shadowing and antenna 'clipping' from the edge of the buildings to allow the smart 'tracking' features of the antennas. This is the reason why the antennas are located on the edge of the rooftop and not set back, as they need to be positioned on the roofs edge to ensure the effective transmission of signal to the surrounding area. The alternative would be to set the antennas in from the rooftop, however, to do this the height would need to be significantly raised to ensure coverage did not clip the roofto
transmission. It is considered that this significant raise in height would be more visually intrusive than the solution proposed.

The height of the support poles and antennas is dictated by the heig
surrounding environment (this includes heights of buildings, structures, trees and vegetation); it also takes into account fluctuations in topography. As above, signal needs to be able to 'over-sail' surrounding built form and clutter to effectively deliver coverage to the locality. The antenna heights are proposed at the lowest possible height to ensure the effective transmission of signal to the locality.

The galvanized support poles and bracing are of relatively light weight design and of typical colouring and style for rooftop equipment that will blend into this urban environment. The cabinet is relatively low-level structure that, when viewed in the context of the existing building, will be understood as part of the rooftop plant equipment which is commonly seen in urban environments.

The proposal is for a rooftop scheme on a building which is of no special architectural merit. The site would be viewed in the context of the existing building and roof line as well as those of the surrounding buildings. The antennas and equipment would appear as incidental rooftop features which are proportionate to the scale and massing of the building on which they are located being just slightly higher than the highest part of the building.

The search area is dictated by technical assessment of which areas are experiencing a deficit in the level of network coverage required to meet the increasing demand. The proposed location is the optimum choice for an installation that can provide the required network coverage to the homes and businesses in the area without having a detrimental visual effect on the surrounding area. For these reasons, the proposed site is the most suitable in order to advance existing network coverage and provide improved services to this area of Edinburgh.

The installation is located as marked on the attached drawings at:

MOAT HOUSE FLATS, MOAT DRIVE, HUTCHINSON, EDINBURGH, EH14 1NS,

NGR: 322663E, 671847N

We also enclose an ICNIRP Declaration and drawing no's 100A, 200A, 201A, 300A and 301A

We trust that this information is useful in assisting you to maintain an accurate and up to date register of telecommunications installations. My clients are eager to initiate early development in order to provide upgraded coverage and improved connectivity at the above location. We would be grateful if you could provide your acknowledgement that the proposed electronic communications apparatus/development is permitted development at your earliest convenience.

Should you have any queries regarding this matter, please do not hesitate to contact me (quoting cell number CS308587).

Yours faithfully,

[redacted]

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(for and on behalf of Cornerstone)

Enc. Drawings
ICNIRP Declaration & Clarification Statement
General Background Information for Telecommunications Development