

City of Calgary, Honourable Members of Council  
Calgary City Hall  
800 Macleod Trail SE  
Calgary, AB T2G 5E6

January 28, 2025

**Re: City Council, Public Hearing—Tuesday February 4, 2025**  
**Land Use Amendment in Tuscany (Ward 1)**  
**10 Tuscany Hills Road NW**  
**CPC2024-1260: Planning and Development Services, Report to Calgary Planning Commission**  
**LOC2024-0093, Bylaw 26D2025 (Proposed)**

To the Honourable Members of Calgary City Council,

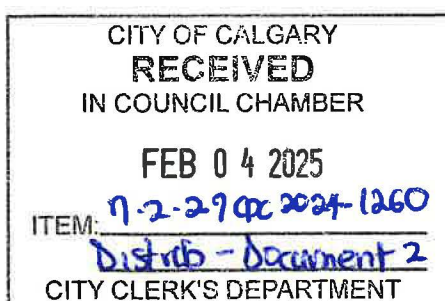
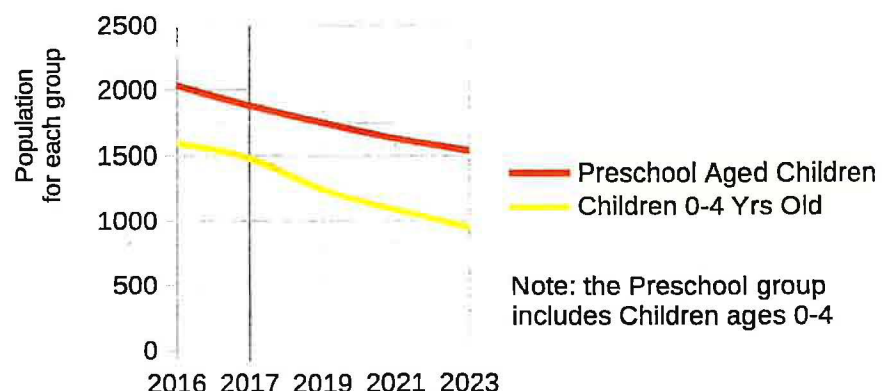
Please accept these written comments which provide rationale for our Opposition to the proposed Land Use Change, from R-CG to DC to accommodate a Child Care Service, at 10 Tuscany Hills Road NW.

It is our position that the proposed amendment is inappropriate for the following reasons:

1. **Contrary to Policy.** This application does not meet Calgary "*Child Care Service Policy and Guidelines*" for a Child Care Service (PUD2021-0649). Specifically, the application is deficient in 5 of 7 Site Selection Criteria (detail follows).
2. **In-congruent with Area Structure Plan.** The Application is NOT consistent or in keeping with the current, Council approved, and in-place Area Structure Plan (details follow).
3. **Demographics.** From 2016 to current, the number of Tuscany residents who are Preschool Children has decreased by 4.57% **per year**, and children aged 0-4 years have decreased by 6.3% **per year**. Both the absolute number of children in each category, and as a percentage of Tuscany's population have been continually declining.  
The rate of decline in Preschool aged children will increase, and eventually settle close to that of the age 0-4 group.

### Declining number of pre-school aged children in Tuscany

#### Tuscany is a Maturing Community



## **Child Care Service Policy and Development Guidelines: (PUD2021-0649)**

### **Site Selection Criteria**

- The “Report to CPC” states that this Site meets six of the seven Guidelines. However, a more thorough examination indicates it meets only two of seven. The five it does not meet are as follows:

#### ***B.3 – Child care services should be located on a Site that can provide sufficient staff parking and pick-up and drop off parking.***

- The Site does not have sufficient parking for a large, commercial operation. Staffing ratios as per the “Early Learning and Child Care Act” Regulations, hosting 39 children on Site would require a minimum of 6 staff where there is not a bathroom built into each classroom. This includes 4 staff to supervise the children if they are all 4 years old or greater, 1 staff to accompany children to the bathroom, and 1 staff to cover mandated breaks. The applicant’s own Development Permit project summary sheet indicates 7 staff to supervise 39 children, 1p2007 specifies a minimum of 1.0 parking stalls per 2 employees on site.
- A minimum of 4 parking spots would be required to support 7 staff, and a minimum of 4 spots for pick-up and drop-off. A minimum of 8 parking spots are required.
- The internal width of the garage is too narrow to allow for 2 parking spots. So 1 spot in the garage, 3 proposed at the rear of the property, and assuming 2 parking spots on the front parking pad in tandem with the garage. This yields a total of only 6 parking spots – fewer than a Child Care Service for 39 children requires.
- This criteria also states the Site should not front a bus zone, as this would impair pick-up and drop-off parking. The proposed location with its front being only a few meters away from a busy, controlled intersection render it far more impacted (storage lanes) than if it were only a bus zone
- Note there is not adequate space for more than one vehicle to stop on Tuscany Hills Road along the Site’s frontage, and that space is already used as a storage zone for cars waiting to travel north through the intersection at Tuscany Boulevard and Tuscany Hills Road. Because of the Site’s very close proximity to the traffic lights, any vehicle stopped on Tuscany Hills Road in front of the Site would block one of only 2 lanes exiting the area. Reducing or blocking the vehicle storage zone, and traffic flow by 50% would severely impair the intersection, causing drivers to be frustrated and possibly make unpredictable, and unsafe maneuvers. This puts school children, pedestrians, cyclists and other motorists at risk. There are close to 1,000 students and staff of 12 Mile Coulee School who already pass through that intersection, at least twice per day. That is in addition to thousands of Tuscany residents who travel this route multiple times every day as well.
- Although parking spots and ratios are determined at the DP stage, the Site is insufficient when one also accounts for the need to include commercial garbage and recycling or snow storage, especially if necessary outdoor play space is to also be accommodated (as per B.4, below)

#### ***B.4 – Child care services must be located on Sites large enough to accommodate outdoor play areas.***

- This Site would be relying on access to supplementary recreational spaces. The Applicant has implied that they would have use of the 12 Mile Coulee School site adjacent to the parcel.

However, the application does not account for it being a Calgary Board of Education property, and the Board has confirmed in writing, that the lands at 12 MC School would NOT be available for use by the Child Care Service from 6am to 6pm, weekdays. To the North is the entrance to Twelve Mile Coulee Reserve, a natural area and protected environmental space where regulations require that any use be restricted to (must stay on) the officially designated paved path. To the North-West is the play-park at the Tuscany Residents Association but which is not available for commercial groups to access and only accommodates a small number of "guests" per visit with a Tuscany resident in good standing. If this Site is converted, the parcel will have no residents, and no opportunity to use the TRA's parks and facilities.

***B.5 – Child care services should be located on collector streets.***

- Although Tuscany Road may be a collector road, this proposed Site is not accessible upon turning on to Tuscany Road, from Tuscany Boulevard (arterial road), due to the road median the Site fronts.
- This criteria states that a site may be considered "provided access to the facility does not draw traffic through the community". Accessing the rear parking from the lane behind the Site requires traversing through the residential community as there is no access from either Tuscany Boulevard nor Tuscany Hills Road. The proposed use would increase traffic load into and out of the residential neighbourhood through all of the back lane, adjoining street, and adjacent cul-de-sac.
- Seven residences would be directly impacted multiple dozens of times daily if only the back lane were used; fourteen residences if clients looped through the adjacent cul-de-sac connected by the back lane, as we expect will happen as it creates a loop which clients will likely find easier to drive, and park from. We know this, as it happens already with just the Home Based Child Care and have documented it with pictures.

***B.6 – Child care services should be located on corner parcels.***

- Although this address has one residential neighbour, it is not a corner lot with dual frontage for the provision of access, nor does the parcel share a side property with a lane. A corner lot abuts two cross streets, which provides up to 400% of curb length available for drop-off and pick-up, compared to a parcel without access on 2 adjoining sides.

***B.7 – Sites should be evaluated on its own merits, the proposed intensity of the child care service and its potential impact on adjoining properties should be primary considerations.***

- The surrounding and adjoining residential properties would be highly impacted by increased traffic through the lane and/or cul-de-sac if accessing rear drop-off/pick-up parking. Additionally, there will be environmental impacts, and concern regarding the commercial operation's handling and disposal of a very large quantity of garbage (including human waste), as well as significant noise generated.

## Planning and Development Services Report to Calgary Planning Commission

*Note there is no indication that Calgary Planning Commission discussed, assessed, commented on, voted on, or even reviewed this report which was prepared for their use. This appears to stakeholders other than the applicant, to be a significant breakdown in the process of assessing Land Use Changes. We, the community and its many stakeholders opposed to this LOC/DP application expected, and were relying on an objective and balanced assessment by the CPC. Where at least some member(s) of the CPC would take into account, and assign some value to the negative implications of these proposed changes for the majority of stakeholders—rather than the benefit – to only the applicant, and perhaps a couple dozen client families.*

*Please note also, the provincial licensing / regulating authority, and the “Early Learning and Child Care Act / Regulations” is concerned (only) with the health and welfare of the children under care. This authority has no rules, regulations or controls which address concerns of neighbours, or the impact of the commercial operation on other stakeholders (ie. adjacent property owners, neighbourhood, or the community as a whole; represented by the elected board members of its Community Association)*

*These stakeholders have only the municipality, through the controls and limits of its bylaws to protect their, and the public interest. Bylaws exist not to enable opportunistic behaviour, but to ensure the limits of use, intensity and development of the parcel does not adversely impact the other stakeholders.*

*Land Use Designation (including Direct Control) Bylaws must prescribe rules which are consistent with the community plans previously approved by Council, such as those in the Revised West Scenic Acres Area Structure Plan.*

*A parcel's USE and INTENSITY is NOT limited by its owner's current “plan”. Its use and development (and so the impacts on other stakeholders) is limited ONLY by the specific limitations and restrictions imposed by it's governing Bylaw—and which have NOT been “Relaxed” away!*

*Any element of a parcel's use, that is not specified in the applicable by-law is UNLIMITED. ie. number of children, hours of operation, lot coverage ratio (ties directly into # of parking stalls), allowed number of visits per day/week, building height, placement of HVAC equipment, landscaping requirements, garbage storage and removal, deliveries, placement of exterior lights and/or cameras ...*

*Current practice of DC's, stating a governing land use district/bylaws (ie R-CG), and then explicitly allowing for relaxations, completely castrates the “governing” district rules, and leaves remaining rules powerless and ineffectual! (per item 7, in the Proposed DC Bylaw, 26D2025)*

### **Example 1:**

Parcel Coverage per R-CG rules is limited to 45% of parcel's area ( $482\text{m}^2 * 45\% = 217\text{m}^2$ )

Area of house/garage footprint per applicant:  $1,724.5\text{ft}^2 = 160\text{m}^2$

Coverage area remaining for additional parking stalls( $19\text{m}^2$ ),  $= (217 - 160) = 57\text{m}^2$

- allowable additional parking stalls on parcel:  $= (57\text{m}^2 / 19\text{m}^2) = 3$  stalls, INCLUDING any on driveway.

### **Example 2:**

Maximum number of business automobile visits per week: 15 (Home Occupation Class 2)

Proposed number of visits per week:  $[(39 \text{ children} * \text{twice daily}) + 7 \text{ staff}] * 5 \text{ days} =$

$= 425$  business automobile visits per week (vs maximum of 15 per R-CG)



The following comments add clarity and rebut some of the statements, evidence and conclusions presented in the *Planning and Development Services Report to the Calgary Planning Commission—CPC2024-1260*. We seek to provide additional context. Further, there are discrepancies submitted by the applicant, especially with regards to their Community Outreach efforts.

Corrections / Clarifications of the “Highlights” Section of the Report:

- Stating the proposal *may* be compatible with the character of the existing neighbourhood does not suggest it is compatible. In fact, a large commercial daycare is not in keeping with the current character of residential Tuscany, and its single family residential parcels.
- The proposal is actually **NOT** in keeping with the Revised West Scenic Acres Area Structure Plan. Section 2.0 Policy Statements indicate there being residential, and related uses in the community and distinguishes each of 2a, 2b, and 2c as being separate uses and distinct from each other.
  - Sub section 2a addresses the types of residential dwellings (single-family, semi-detached, etc.)
  - 2b addresses parks and green spaces
  - 2c addresses related uses (shopping centres, churches, child care facilities, police and fire stations) - existing in separate areas, but not on residential streets (none of these uses were outlined as per 2a)
- none of the related uses included in 2c were foreseen as occupying only one, single family parcel, nor was a “facility” ever foreseen as existing in a detached home!
- While child care may universally be an “essential service” the proposed Child Care Service is not *essential* in Tuscany where there are currently at least 19 already existing child care options, for both full day or before/after school child care, in both private and public/commercial settings. Many offer subsidy. Not every community is required to provide every amenity, and Tuscany already has many childcare options. This is underscored by the “aging” demographic of Tuscany, where today’s population of pre-school aged children is little more than half that of 10 years ago.

Corrections / Clarifications of the “Discussion” Section:

- The parcel’s rear lane access is not accessible from the lot itself, rather the lane must be entered and/or exited via an adjacent street and cul-de-sac or by first passing by 7 other homes sharing that back lane.
- The referenced school within walking distance is a middle school, where attendees are in Grades 6 through 9 and are not viable child care clients requiring before/after school care.
- There are not usable community park spaces in the vicinity. The one to the North-West is the Tuscany Resident’s Association (TRA), whereby the TRA has already expressed opposition to this child care service. Further, the child care service would be ineligible for membership or access due to being a commercial concern. The green space to the West is a Calgary Board of Education School field, who have issued a statement indicating a commercial child care would not be allowed access from 6am to 6pm. The space immediately to the North is the environmental Twelve Mile Coulee Reserve, and runs parallel to 4-lanes of traffic that is Tuscany Boulevard. As it is a natural reserve, it is not accessible for use as a green space, due to the requirement to remain on only the designated (paved) path.
- The closest park available for the child care’s use is the neighbourhood park located to the North-West, on Tuscany Valley Way. The one way commute is just under 500m following a collector road, and requires crossing Tuscany Boulevard.

#### Corrections / Clarifications of the “Engagement and Communication” Section:

- The applicant completed their proposal on January 22, 2024 but met with only two of three adjacent neighbours, and not until May 21, 2024, for 5-10 minutes each. They only approached these neighbours, and subsequently began replying to social media posts, upon learning about community opposition to their project.
- The Community Association was not included in the City-Led outreach efforts
- The Community Association provided not one but 3 letters in opposition in each of May, August and December. (The August letter is included in the record.)

#### Corrections / Clarifications of the “Implications” Section:

- Environmental implications are important. Given the proximity to the Twelve Mile Coulee Reserve, environmental strategies ought to have been at the forefront and not to be “explored and encouraged” at later stages.
- Economic – the Area Structure Plan does not indicate locating commercial / economy generating uses within designated residential sectors.
- Service and Financial implications / risks are not noted in the Report but exist with relation to all of garbage, vandalism, decline in immediate community and potential property values. (The applicant receives great financial compensation from this commercial venture, at the literal expense of neighbours potentially not realizing prior property values upon resale, now living beside a commercial operation). None of these points are referenced in the Report to CPC.

### Attachment 1 – Background and Planning Evaluation

#### Legislation and Policy:

##### Land Use

- The Land Use Bylaw (LUB) Matrix does not show Childcare as a discretionary use in the low density residential district, RC-G, as Tuscany is.

Use	Low Density Residential Districts													
	R-C1L	R-C1Ls	R-C1	R-C1s	R-C1N	R-C2	R-1	R-1s	R-1N	R-2	R-2M	R-MH	R-CG	R-CGex
Catering Service - Minor														
Cemetery														
Child Care Service			*	*		*								

from [calgary.ca/lub](http://calgary.ca/lub), and 1p2007

#### The Revised West Scenic Acres **Area Structure Plan**

- States that this community is intended to be predominantly single-family residential area **providing for non-residential “related uses”, such as childcare, placed in the central portion of the planning area.** All parcels appropriate for non-residential “related uses”- including those for childcare facilities – were located and established at the outline plan stage.

## **Attachment 2 – Proposed Direct Control District**

This second attachment references the various sections in Bylaw 1P2007, pertaining to Direct Control District and the eventual administration of Development Permit, which was submitted at the same time as the application for Land Use Amendment.

Discrepant in this application / attachment, related to Bylaw 1P2007 is:

- the wording in Sections 31 & 36 allowing for relaxations to uses of DC Districts where application: do not comply with all parts of the bylaw. Any relaxations may be applied only if “the proposed development would not unduly interfere with the amenities of the neighbourhood or materially interfere with or **affect the use, enjoyment or value of neighbouring properties.**”
  - A change in Land Use would affect the value of neighbouring properties. The City website accepting the submission of feedback for or against LOCs and DPs indicates that “declining property values” is an ineligible argument. Bylaw 1P2007 references its relevance, as quoted above.
  - A commercial childcare service of the scale proposed would affect the backyard lifestyle (use and enjoyment) of all three adjacent properties due to increased traffic, noise, garbage and related challenges.
- All three adjacent property owners have one or more residents at home during the weekday due to being retired, working from home and/or being a stay-at-home-parent.

## **Attachment 3 – Applicant Submission**

- While no rebuttal nor clarification is required of this brief Applicant Submission, it is problematic for its extreme brevity. A search of archived documents shows other applicants for similar Child Care Service proposals submit full or multiple pages to describe their projects and rationales. The three sentences in this submission leads one to question if the applicant was being purposely vague about the size and scope of their intention. This inference is further supported in Attachment 4, given the gross lack of recommended, applicant-led community engagement.

## **Attachment 4 – Applicant-led Outreach Summary**

Adjacent neighbours and others living in the vicinity of this parcel know many of the answers submitted in this summary document to be false.

- The applicant did not initiate any outreach until learning of a circulating petition against, and other opposition via social media. Except for other people’s community Facebook page posts, there would have been zero communication to the neighbourhood about this project, from the applicant.
- Only 2 neighbours sharing the back lane were eventually contacted in person, for a 5-minute doorstep conversation, but not until four months after the application was submitted, and only upon learning of the organized opposition to the proposed commercial operation.

- Their summary of answers to concerns are discrepant and inconsistent with posted plans for development. Examples:
  - They did not amend their plan to be a 40% reduction. The first application was for 59 children. Proposing a reduction from 59 to 39 children is only a one third reduction in *their plan*. It is, however a 650% increase from the maximum 6 children currently in the day home.
  - They also falsely state:
    - The parcel is **in front of a large school**. (The middle school is several hundred meters to the South.)
    - It will **not add any additional traffic** at any time. (Additional capacity automatically adds additional traffic.)
    - Children aged 2-5 would **not add any decibels to the noise level**, compared to the school field across the street. (Several young children, playing outside throughout the day in direct proximity to neighbours certainly increases volume, compared to teens across the street who are only outside twice a day, during recesses.)
    - The backyard will **only be for Staff Parking**. (There are currently three posted versions of different DP drawings, all indicating Pick-Up / Drop-Off stalls accessed from the back alley.)
    - **Hundreds of families** must use daycare in Dalhousie and Royal Oak. (Hundreds? Where is the data to support this claim?)
    - **Facebook “likes” are an accurate measure of support.**
      - Many who engaged in the social media dialogue expressed appreciation for the applicant finally engaging to answer questions. “Liking” their eventual participation should not be assumed to also mean supporting the plan.

It is concerning if *Planning and Development Services*, and/or *CPC* took these answers at face value and as acceptable evidence of community engagement. “**Applicant Led Community Outreach**” assumes the applicant took initiative to be proactive and transparent and the City recommends this happen before any applications are even filed. Their limited engagement was reactive and, in some examples, embellished or contradictory.

#### **Attachment 5 – Community Association Response**

- The Tuscany Community Association submitted letters of opposition on each of:
  - May 23, 2024
  - August 26, 2024 (included in package)
  - December 2, 2024

Despite the “Report to CPC” acknowledging and including only one of the three letters.



### **In Closing**

Understanding that our Calgary Councillors are relying on the information in the *Report to Calgary Planning Commission* to make their decisions, it seemed important to clarify where some of the details contained therein were perhaps not fully researched or understood. It makes sense the people living near this proposed Site for rezoning have additional context to add, and we appreciate the opportunity to do so.

This letter urges City Council to vote against this Land Use Amendment. The Site and Application do not meet the required criteria.

Kind regards,  
Derek Radomski

January 28, 2025

City of Calgary 800 Macleod Trail S.E., Calgary, Alberta

**Reference: Letter of Opposition -LOC2024-009310 - 10 Tuscany Hills Road NW**

CITYTREND was retained by the landowner located at 20 Tuscany Hills Mews NW to provide a planning review of the issues associated with a proposed land use redesignation and development permit. The proposed rezoning of 10 Tuscany Hills Road NW seeks to transform a Single-Detached Dwelling into a Commercial Child Care Service use. This letter is the summary of our opinion and the identified impacts.

**Purpose of Residential-Grade-Oriented infill (R-CG) District**

(1) The Residential — Grade-Oriented Infill (R-CG) District:

- (a) accommodates existing residential development;
- (b) accommodates a wide range of grade-oriented development;
- (c) accommodates Secondary Suites and Backyard Suites with new and existing residential development;
- (d) provides flexible parcel dimensions and building setbacks that facilitate integration of a diversity of grade-oriented housing over time; and
- (e) accommodates site and building design that is adaptable to the functional requirements of evolving household needs.

**Residential Development:** The Residential – Grade-Oriented Infill (R-CG) District is intended to accommodate a variety of grade-oriented residential uses, including rowhouses, duplexes, and Secondary Suites, while supporting existing residential development. It prioritizes adaptable site and building design to meet evolving household needs over time. Importantly, this district does not accommodate commercial uses, as its focus is exclusively on preserving residential character and functionality.

## Child Care in R-CG

Within the R-CG district, specific uses are identified to ensure the residential nature of the area is preserved. Reference to Child Care use as a class 1 is made as well as larger Child Care uses in existing buildings.

### Home base Child Care in R-CG

Home Based Child Care – Class 1 is defined in Section 206.1, this use is permitted as an incidental use of a Dwelling Unit for the purpose of providing temporary care or supervision to a maximum of 6 children.

The purpose of allowing Home Based Child Care – Class 1 is to support families by providing childcare within a residential setting, without significantly altering the residential character of the neighborhood.

### Restriction of Child Care Services in R-CG

"Child Care Services are discretionary uses if they are located in buildings used or previously used as Community Recreational Facility or School Authority-School". The suitability of these institutional buildings to a Child Care Service is obvious. The buildings are large. They include indoor recreation space. They are surrounded by fields and playgrounds, which provide ample frontage for offsite parking. They have onsite parking with drop-off/pick-up stalls. They have bicycle parking stalls. These amenities make them suitable for Child Care Services.

## Inconsistency with Existing Zoning

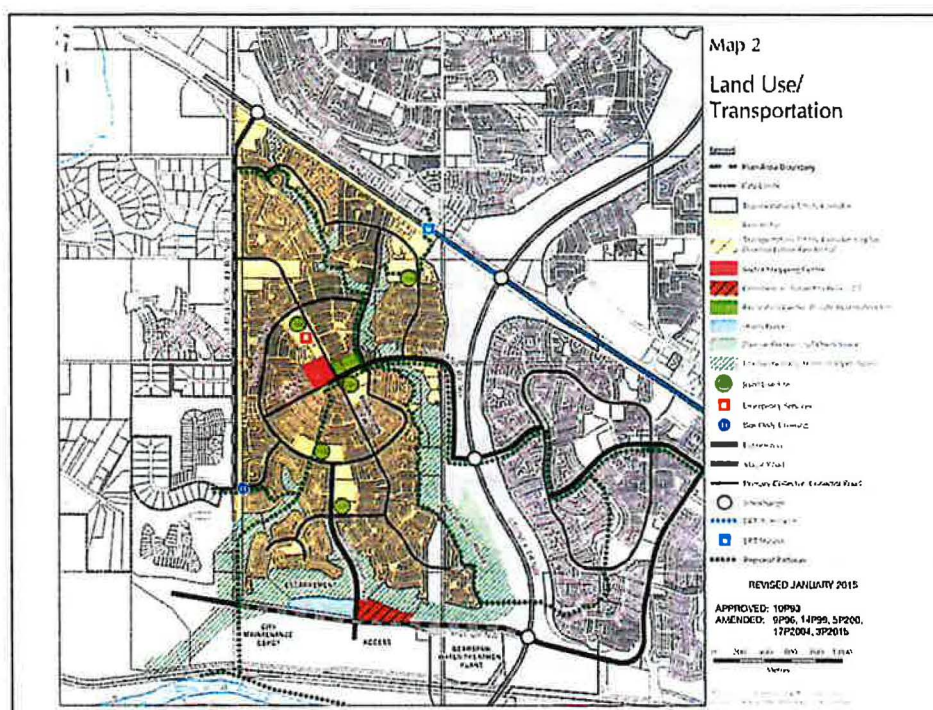
The proposed rezoning to allow for a Commercial Child Care Service Use with no limitation is inconsistent with the R-CG District for several reasons:

**Increasing Child Capacity:** The maximum allowable number of children for Home Based Child Care – Class 1 under the current District is 6. The application (under the current development permit) proposed to accommodate 39 children which far exceed the current regulations of 6. The rezoning does not limit the number of Children which could be increased significantly based on the size of the Single-Detached Dwelling and the current provincial regulations.

**Employee:** The proposal will include numerous employees – an increase from the 1 non-resident employee allowed under Home Based Child Care – Class 1 of the current District. This increase in staff further intensifies the use beyond what is permitted in the R-CG district.

**Impact on Residential Character:** The scale and intensity of the proposed Commercial Child Care Service Use is inconsistent with the R-CG district's purpose of maintaining a contextually sensitive residential environment. The introduction of a commercial facility with high traffic volumes, significant noise levels, and increased demand for parking is not in line with the residential character intended by the R-CG zoning.







## Development Permit Submission

A Development Permit application (DP2024-02097) was submitted concurrently with the land use redesignation. This Development Permit includes a site plan illustrating the proposed parking on the site. The Development Permit proposes a total of 6 parking stalls, with the arrangement as follows: 5 stalls located on-site (2 within the garage and 3 along the rear lane) and 1 stall provided on the street. Below is an extract from the Development Permit application submitted to the City of Calgary, highlighting the proposed parking layout.

## Inconsistencies with Current Context

It is our opinion that the proposed front parking is not consistent with the current front yard context and creates unsafe traffic movement for several reasons:

**Unsafe Traffic Movement:** With a single-detached dwelling, the vehicle movement from the garage to the street is a movement done by the residents every day. A resident would have the benefit of driving daily and learning safe driving patterns, thus reducing the risk of accidents. Backing out onto Tuscany Hills Road NW by multiple non-resident drivers increases the risk of accidents, especially with increased traffic volumes from the proposed use. The current use and configuration help to maintain safe and predictable traffic patterns.

**Traffic Flow and Safety Issues:** The property and its garage are located along Tuscany Hills Road NW, which has a median limiting the ability for southbound traffic to reach the driveway. This median also forces traffic to head northbound when leaving the site. This context will create situations where drivers will have to perform a U-turn or make an illegal movement to reach the front driveway. Such maneuvers increase the risk of traffic accidents and disrupt the flow of traffic, further exacerbating safety concerns for both drivers and pedestrians in the area.

## Rear Parking Concerns

The Development Permit proposes 3 parking spots in the rear of the property, with access from the residential lane. Although the property in question is at the north end of the block along Tuscany Hills Road NW, the lane access will be from Tuscany Hills Crescent NW and/or Tuscany Hills Mews NW.

**Mix of Commercial and Residential Traffic:** Reducing the mixing of commercial and residential traffic is both common practice and one of the reasons for selecting corner sites for commercial uses. In this case, the rear access for pick-up and drop-off and/or staff will mix with the entire residential block. The proposed rear parking forces commercial traffic to navigate through residential lane and streets, increasing the potential for conflicts and safety issues between residential and commercial traffic.

**Lack of Familiarity with Road Conditions:** Unlike residents who use the road and lane every day and are familiar with its conditions, commercial traffic such as parents and staff may not be

as accustomed. This lack of familiarity can increase the likelihood of accidents or problematic behavior. Additionally, the lane is graveled, and conditions become challenging during the winter, which may incite patrons to use the street for drop-off and pick-up, further complicating traffic patterns and pedestrian safety.

## **Proximity to Multi-Family Development**

The selection of an appropriate site is critical in ensuring that the development is consistent with the context and the policies. As part of the location selection, the ability to be in proximity to multi-family development is essential. Proximity to high-density residential areas allows for a higher number of potential clients who can access the facility by walking, thereby reducing vehicle traffic and its associated impacts.

**Final Notes**

The proposed rezoning of the property to accommodate the proposed use does not align with the policies and the purpose of the R-CG. It significantly increases the number of children allowed in a Single-Detached Dwelling and introduces a level of intensity that is not compatible with the residential character of the area. The current zoning supports maintaining the neighborhood's integrity and ensuring that any redevelopment is contextually sensitive and in keeping with the existing residential environment.

The proposed parking layout increases the risk of traffic accidents and negatively impacts the pedestrian environment along Tuscany Hills Road NW. The rear parking proposal introduces commercial traffic into residential lanes, contrary to best practices for minimizing traffic conflicts in residential communities.

We strongly believe that the City of Calgary should refuse the application and request the applicant to select a more appropriate site.

Sincerely,

  
**BRYAN ROMANESKY**  
CEO**CITYTREND**

