

Exhibit D.1

Area Land Owner Submissions

From: [REDACTED]
To: [Appeals; Development](#)
Subject: [External] SDAB006 2025 Support Letter - 4240 - 59 Street Proposed Supportive Living Accommodation
Date: January 27, 2026 12:03:01 PM

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Attention: Lisa Nord, Board Clerk

I am writing this letter to show my support for the proposed Supportive Living Accommodation at 4240 - 59 Street in the Waskasoo area. I feel that this development would be a positive addition and opportunity for the City of Red Deer and its residents. This development would offer additional much needed seniors housing availability, provide positive tax revenues and also provide economical increases with the creation of job opportunities not only during construction but with the continued maintenance and assisted living positions it would provide once complete. All of these growth opportunities while creating no financial implication to the city or community but becoming a positive revenue generator.

Not only do I feel that this development would be an asset solely to create tax revenue and job opportunities, I think it would bring some much needed revitalization to the area, the section of land that the development is proposed for has sat unused for as many years as I can remember growing up in Red Deer as a vacant grass lot. Other areas of Red Deer are undergoing modernization and revitalization in older areas to breathe new life into the communities and I feel that a seniors supportive living building would provide many positives to this community area, despite opposition by the Waskasoo Community Association.

The proposed development application meets the guidelines of the Waskasoo Area Redevelopment Plan and the Environmental Character Statement. City Administration approved the development as it meets the land use bylaws, environmental requirements and does materially increase traffic.

Situated on a large lot, the developer has taken careful consideration to design a compact, well-managed building, along with thoughtful landscaping and outdoor places for senior residents to be able to socially engage with other residents and neighbors, making efficient use of land while maintaining community character. Thoughtful design has placed parking and the main entrance to the rear of the building so as not to increase traffic and parking and provides curb appeal for the neighboring homeowners. Reviewing the overall lot and building layout, I feel like there was a lot of effort spent trying to create a new building that would fit within the community and provide positive street value blending in well with not only surrounding infrastructure but also the natural river area landscape.

Overall, I feel that this project has been unfairly denied due to political influence by a small group that should have no bearing on what developments are approved by City Administration if all requirements are met. Proposed developments should be assessed on their own merits not with an unfair bias to appease a local neighborhood that for long standing has stood on entitlement. The Waskasoo Community Association does represent City of Red Deer residents as a whole and should not have a say in denying a project that should be approved.

This development offers far too many positives to the city both socially and economically and I fully support its approval.

[REDACTED]

City of Red Deer Resident for 30+ years

From: [REDACTED]
To: [Development; Appeals](#)
Subject: [External] Appeal No: SDAB006 2025 Supporting Living Accommodation
Date: January 26, 2026 9:48:53 AM

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To: Lisa Nord- Board Clerk and to whom it may concern,

As a senior who is planning out my retirement I have been eagerly anticipating the new 48 unit supportive living development at 4240 59 St Red Deer, Alberta.

I am writing to express my strong support for this development as it will meet every need for my retirement living at this stage of my life. I want to live there! Although I am a long way from needing a full-scale senior's home, I am realistic about being able to age comfortably and safely with flexibility. This new development allows for this balance.

One of the biggest draws for me is the location. Being close to nature and also amenities matters deeply to my quality of life. The Waskasoo green spaces and trails support healthy living and directly impacts my mental well being and independence.

I value having a community that supports both indoor and outdoor social activities as isolation is a concern for many seniors. Also walkable amenities and bus service means I may not require a vehicle.

I am surprised with the severe shortage for seniors housing of this type that the community association would reject this well-planned supportive living for many who will need it. This seems rather selfish and short-sighted.

I don't understand why the City of Red Deer would turn down a much needed privately funded project when seniors housing is so desperately needed.

I urge the board to consider the voices of people like me - seniors who want to remain part of Red Deer's vibrant community, who value independence and who see this development as a positive and necessary addition to Red Deer's housing.

I have been a resident of Red Deer for almost 40 years. I relocated from Nova Scotia in my 20s and settled and made Red Deer my home and paid my taxes and contributed to the economy working full time.

Thank you for taking the time to consider my perspective.

Yours sincerely,

[REDACTED]

Red Deer, Alberta

From: [REDACTED]
To: [Development; Appeals](#)
Subject: [External] Proposed Supportive Living Accommodation at 4240 - 59th Street, Red Deer AB
Date: January 27, 2026 12:59:09 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

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Attn: Lisa Nord

Dear Members of the Planning Department,

I am writing to express my support for the proposed development in the Waskasoo neighbourhood, currently zoned Public Service (PS), for a supportive living / assisted living and seniors' residential community, with these five key points:

1. Population and Housing Needs in Red Deer

Red Deer's population continues to grow steadily. Estimates indicate the city's population is now over **115,000 people** and remains Alberta's third largest city, with continued growth trends year-over-year. Although detailed official projections for Red Deer over the next 20 - 30 years are not readily published in a single public report, municipal growth planning (e.g., annexation planning and growth monitoring) relies on long-range forecasts that show continued demand for housing and expanded residential opportunities within the city.

City housing needs assessments have also shown that **additional housing units are required to meet both growth and affordability needs** — including an ongoing deficit in housing supply relative to demand.

2. Aging Demographics and Assisted Living Demand

Demographic trends across Canada and Alberta demonstrate a substantial increase in the senior's population, particularly those aged 65+. National sources project that Canada's seniors' population (65+) will grow by **approximately 68 % over the next 20 years**, meaning the older adult demographic will represent a significantly larger share of the population.

In Alberta, provincial forecasts suggest that by 2046, **one in five Albertans will be 65 years or older**, and demand for continuing care and supportive living services is projected to grow by roughly **80 % over the next decade** due to increased longevity and complex care needs.

This demographic shift underscores the increasing need for **assisted living and supportive living facilities** that allow seniors to age in place comfortably and safely. Without proactive planning and development of appropriate housing options, our city risks inadequate accommodations and pressure on hospital and long-term care services in the future.

3. Benefits of the Proposed Development

Meeting Housing Diversity and Growth Needs:

The proposed development in Waskasoo would provide much-needed housing diversity, particularly for seniors and individuals who require various levels of support. As the population ages, diversified living options — including supportive living — ensure that residents of all ages can remain active, integrated, and contributing members of the community. This location would ensure these seniors are centrally located and close to services and amenities that cater to their needs.

4. Minimal Vehicular Traffic Impact:

It is important to note that assisted living and seniors' residences typically generate **significantly lower traffic volumes** compared with other types of multi-family residential uses. Residents of these facilities often do not drive due to age-related mobility changes, and staff arrivals/departures are generally spread across typical shifts, reducing peak hour congestion. Supporting documentation submitted with previous applications (e.g., trip generation rates comparison) has indicated **lower trip generation** relative to standard multi-family residential developments. This characteristic supports the argument that such developments do not materially increase traffic burden on surrounding neighbourhood roads.

5. Strategic Growth and Community Well-Being

Red Deer's strategic planning documents envision growth that is sustainable, diverse in housing types, and responsive to demographic changes. Providing supportive living and seniors residences aligns with broader municipal goals of meeting future housing demands and enabling aging-in-community options for residents.

Given the city's continued growth, the pressing need for a range of housing options, and the demographic shift toward an older population requiring specialized care and living arrangements, I respectfully encourage the Planning Department and Council to support the rezoning application and move forward with consideration of this development.

Thank you for your time, careful consideration, and ongoing leadership in shaping Red Deer's vibrant and inclusive future.

Sincerely,

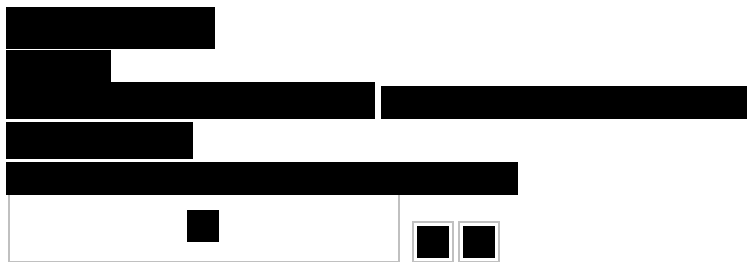
Final Thoughts:

The City Administration previously recommended that the Municipal Planning Commission (MPC) approve this application based on applicable planning policies, the City's Land Use Bylaw, and established planning principles designed to ensure land uses are compatible and appropriate. While the MPC's earlier decision did not align with that recommendation, it's important to recognize that planning decisions are most effective when they are grounded in sound land use policy and objective criteria rather than external pressures. The planning framework in Red Deer exists to guide decisions that balance individual community

preferences with the broader needs of the whole city. I appreciate that some residents in the neighbourhood have expressed concerns about change — that is a completely valid community perspective. At the same time, the subject property’s zoning designation and the fundamental planning context have not changed, and the Subdivision and Development Appeal Board (SDAB) is tasked with reviewing this appeal in an impartial, quasi-judicial manner. I respectfully encourage the SDAB to consider this application fairly and reasonably, based on the Land Use Bylaw, relevant planning policies, an experienced and respected developer in the community and the intent of good long-term planning for Red Deer, which strives to create sustainable, liveable neighbourhoods for all residents.

Given the demonstrated need for additional supportive living accommodations, the suitability of the proposed location, and the thoughtful design and purpose of the project, I strongly encourage the approval of this development. It represents a responsible, compassionate, and forward-looking investment in Red Deer’s future.

Thank you for your consideration



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From: [REDACTED]
To: [Appeals](#)
Cc: [Development](#)
Subject: [External] No. SDAB 006 2025
Date: January 27, 2026 4:57:54 PM

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Hi Lisa,

I am writing to express my sincere support for the proposed development currently before the Board on appeal.

This proposal represents more than a building project, it represents an opportunity to respond thoughtfully to real needs in our community. Many families are struggling with limited housing options, and more residents are facing difficult questions about where their aging parents and loved ones can live safely and with dignity. The inclusion of assisted living within this development offers hope that seniors can remain close to their families, their doctors, and the neighborhoods they know and trust.

I am also mindful of the positive impact this project would have on local workers. Construction would provide meaningful employment for tradespeople, contractors, and suppliers in our area - jobs that support households and contribute directly to the strength of our local economy. At a time when so many are feeling financial pressure, this kind of opportunity matters.

It is disheartening to see a well-planned proposal - one that has received unanimous support from City Administration - face such resistance, especially when the land has remained vacant for years. This development reflects care, investment, and a genuine effort to contribute positively to the community.

I hope the Board will consider not only the technical merits of this application, but also the very real human impact it can have. Approving this project would be a meaningful step toward building a more inclusive, compassionate, and forward-looking community.

Sincerely,

[REDACTED]

Red Deer, Alberta

From: [REDACTED]
To: [Appeals](#)
Cc: [Development](#)
Subject: [External] SDAB006 2025 - Attention: Lisa Nord, Board Clerk
Date: January 27, 2026 9:19:51 AM

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January 26, 2026

Subdivision & Development Appeal Board

Attention: Lisa Nord, Board Clerk & Jay Hallett

Project: 48-unit Seniors Supportive Living accommodation at 4240 - 59 Street

I am writing as a community member in support of the proposed development currently under appeal.

Our city is facing real pressures: limited housing, rising costs, and a growing need for assisted living options for our aging population. This project helps address all of those issues. It would provide much-needed housing for seniors who want to stay close to family and community, while also strengthening the overall housing supply.

This development would also bring real economic benefits. Construction would create good local jobs for tradespeople, contractors, and suppliers, and support many families in our community. Turning away that kind of opportunity—especially when the project requires little financial investment from the city—does not make sense.

The land in question has sat vacant for years. A property owner should be allowed to responsibly develop their land, particularly when the proposal is well-planned and supported by city administration.

I encourage the Board to consider the broader community benefit and approve this development.

I have a young family and we use the parks and trail system in that area regularly and I do not see this development have any negative effects on my family's enjoyment of the trails and parks in the area. As someone who has parents and 1 remaining grandparent who is in an assisted living facility, I understand how much they appreciate being around younger members of the community. I think the proximity to the trails and play grounds is also something to be considered for the future tenants of the building as they will enjoy hearing the sights and sounds of kids playing or families using the trail system.

Thank you,
[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Cc: [Development](#)
Subject: [External] SDAB006 2025 - Waskasoo Seniors Supportive Living
Date: January 22, 2026 10:29:49 AM

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Hi Lisa,

I am emailing you today in support of the Senior Supportive Living proposed for 4240 - 59 Street in Waskasoo. I have followed the progress of this storied property for some time now. With being related to a previous administrator of Gateway School I have some understanding of how the property was subdivided by the County School Board to facilitate their land sale deals when moving out of the city and with that the land then subsequently stopped being a 'park'. This large property has sat idly for many years now and it is my opinion that it is long past due to be developed into a tax generating facility. Not that this one development will solve the problem but higher density housing is what that will help decrease the cities infrastructure and operations costs which will help ease the burden for the rest of us.

I am amazed that with the housing availability crisis that a 48 unit facility wouldn't be fast tracked to free up the in demand single family homes that is currently held by our seniors who aren't yet at a point in life of needing to be shoved into a nursing home for the province to then deal with the ever growing healthcare costs. With health advancements and age expectancies being what they are, this city should be looking for opportunities to help our population age with the idea of transitioning out of their single family homes and into condo style living. When visiting Calgary and Edmonton it's amazing to see the rejuvenation of their old neighborhoods and I'm surprised that this city accepts developments being shouted out of a neighbourhood when the concept is one that would be beneficial for the rest of the city. With the planned development falling within the requirements of the land use bylaws makes it that much more confounding. If this lot was available in Calgary or Edmonton it would be utilized for maximum units.

I look at this facility as a life long Red Deerian with aging parents (also life long Red Deerians) who live in a two story house and enjoy utilizing the city park system near their house and wonder why this facility is being blocked when it clearly fills a void in the housing options available in this city for which there is a need. Waskasoo is a great neighbourhood with the river bike paths, McKenzie Ponds, Kerry Wood Nature Centre, and the Memorial Centre. This area is an ideal neighborhood for seniors to get out and enjoy the amenities that make this city a great place to live. With the proximity of the schools and single family residences, a seniors supportive living facility is about the only development that makes sense in that neighbourhood.

People cant afford single family homes which are not being built fast enough so the easiest solution is to provide our aging population with a reason to move out of their homes and it's facilities like this that will cause the shift that's needed. I'm not sure why Waskasoo is granted so much say in happens next door to them, but the rest of us think this is a good idea.

Thanks,

[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Cc: [Development](#)
Subject: [External] RE: SDAB00 2025
Date: January 27, 2026 10:42:53 AM

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Hello.

I wanted to send a quick email, I do support the development at 4240 59 St.

The Waskasoo site is ideal for this type of development, offering many benefits for the aging population. It provides a wonderful location and option for residents within Waskasoo to stay in their community as they age, allowing them to continue enjoying the things they love about it. This aligns with the goals of creating inclusive communities and offering diverse housing options.

Thanks

[REDACTED]

From: [REDACTED]
To: [Appeals; Development](#)
Subject: [External] Letter of Support for Appeal NO. SDA006
Date: January 27, 2026 8:16:24 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

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To the Members of the Subdivision and Development Appeal Board,

I am writing to express my support for the appeal filed by East Lincoln Property Corporation regarding the Municipal Planning Commission's refusal of the development permit for a 48-unit supportive living seniors residence at 4240 59 Street in the Waskasoo neighbourhood. I am a resident of Red Deer, and I believe this development should proceed.

My support is grounded in the fact that Red Deer needs more supportive living options for seniors. Our population is aging, and many residents want choices that allow them to remain in this community as they grow older. Supportive living developments offer an important housing alternative between independent living at home and full long-term care. Denying a proposed development that would help meet this need runs counter to what many seniors in this city are looking for and what our community needs overall.

This project also represents a meaningful economic benefit. The construction of the facility will create jobs for local tradespeople and suppliers, and the ongoing operation will require staff and services that contribute to the local economy. These are real opportunities for workers and businesses in our community.

The location proposed for this development is also valuable for seniors who would live there. Being close to the Red Deer River, walking trails, parks and neighbourhood amenities would enhance the quality of life for residents. Easy access to outdoor space and natural settings is not a trivial thing; it supports wellness, promotes physical activity, and contributes to mental health. Choosing to place supportive living housing in a setting where residents can enjoy the environment around them reflects thoughtful planning rather than a detriment to the neighbourhood.

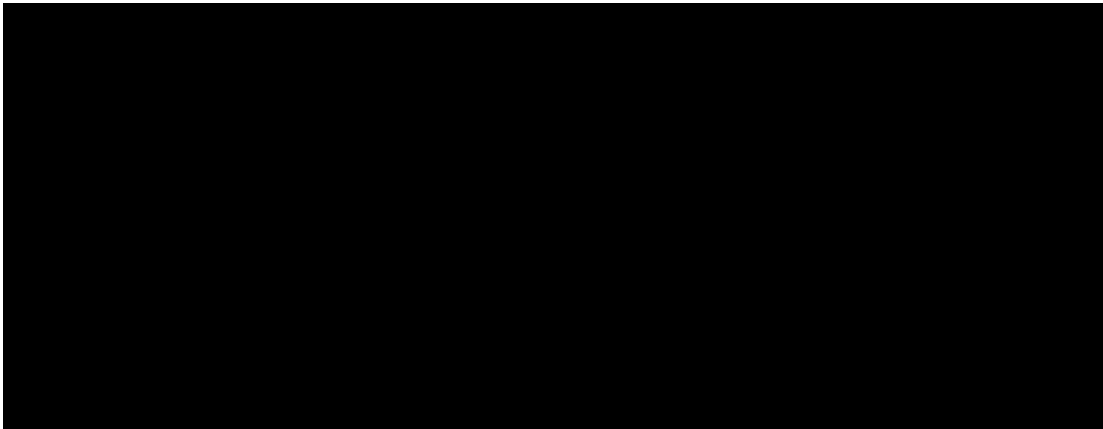
I understand there are concerns about neighbourhood character and compatibility, but I do not see rejecting development outright as the right answer. A refusal built primarily on

neighbourhood resistance can result in stagnation on important housing needs while the population that needs these services continues to grow. The Municipal Planning Commission's decision to unanimously refuse this application overlooks the broader community benefit that this project offers. Fair consideration of our city's housing needs should have equal weight to preserving green space when balanced properly in the planning process.

For these reasons, I urge the Board to allow the appeal and permit this supportive living development to move forward. Approving this application aligns with the wider needs of Red Deer residents, local economic activity, and the desire of many seniors to live in supportive and accessible environments.

Thank you for your time and your consideration.

Sincerely,



From: [REDACTED]
Cc: [Appeals Development](#)
Subject: [External] Appeal No. SDAB006 2025
Date: January 27, 2026 12:00:57 PM

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Hi Lisa,

I am writing as a resident who strongly supports the proposed development now under appeal. Like many others in our community, I care deeply about the future of our city and the kind of place we are building for our families, seniors, and neighbors.

Right now, we are facing real challenges, housing is harder to find, costs are rising, and many people are being priced out or forced to leave the community altogether. This project offers a practical, positive step forward. It would bring new housing, create jobs, and add much-needed tax revenue, all while using land that already has the infrastructure in place. That seems like a responsible and sensible way to grow.

One part of this proposal that I find especially important is the inclusion of assisted living. Our community is aging. Many seniors want to stay close to the neighborhoods they know, near family, friends, and familiar services. Right now, there simply are not enough options. Developments like this help ensure our parents, grandparents, and neighbors can remain part of the community instead of being forced to move elsewhere due to lack of suitable housing.

It has been frustrating to watch this project struggle to move forward, particularly when the land has sat vacant for years. Opposition that seems rooted more in resisting change than in genuine planning concerns does not reflect the needs of the wider community. The concept of Not-in-my-back-yard, seems especially prevalent and incredibly short-sighted. The developer clearly invested significant time and care into this application, and the unanimous support from city administration speaks volumes about its quality.

I believe we need to ask ourselves what kind of message we are sending if thoughtful, well-planned projects like this continue to be rejected. Our city should be open to responsible development, especially when it addresses real needs.

I urge the Appeal Board to consider the broader benefits of this proposal and approve the development. I truly believe it would make our community stronger, more inclusive, and better prepared for the future.

Thank you,

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Cc: [Development](#)
Subject: [External] Proposed Supportive Living Accommodation at 4240 - 59 Street
Date: January 27, 2026 12:19:07 PM

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Hi,

I am writing to express my support for the supportive living accommodation at 4240-59st. Our city is in need of more housing especially for our seniors so they can stay in the City of Red Deer.

The development also gives an opportunity for our local construction companies and tradespeople to have local work. This will strengthen jobs and help keep talented tradespeople working in our city.

I respectfully ask the board to approve the development.

Thank you,

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Subject: [External]
Date: January 27, 2026 9:27:07 AM

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January 26, 2026

Subdivision & Development Appeal Board

Attention: Lisa Nord, Board Clerk

I am writing as a father and community member to passionately express my support for the proposed development currently before the Board on appeal.

Like many families, I am deeply concerned about the future of our community. Housing is becoming increasingly difficult to access, costs continue to rise, and options for seniors who wish to remain close to their loved ones are limited. The inclusion of assisted living in this development is particularly significant, as it enables families to care for aging parents while keeping them connected to the heart of the community.

This project promises not only to provide meaningful local employment through construction and related trades but also to uplift working families and contribute to a thriving local economy. These are not just benefits; they are the building blocks of a vibrant community.

The land has stood vacant for years, and the proposal has garnered unanimous support from City Administration. In my eyes, this represents a visionary and responsible use of the property, as well as a remarkable opportunity to strengthen our community for generations to come.

I respectfully urge the Board to embrace this development.

Sincerely,

[REDACTED]

Subdivision & Development Appeal Board

I am writing as a proud, long-time member of this community to express my support for the proposed development currently before the Board on appeal.

Our city is facing real pressures — a housing shortage, rising property taxes, and increasing construction costs. In this context, it is difficult to understand the degree of resistance this project has encountered. The proposed development would provide much-needed housing, create local construction and operational jobs, and generate new tax revenue — all while making use of existing neighborhood infrastructure and requiring minimal financial investment from the City. From an economic and planning perspective, this project makes sense for our community.

This property has remained vacant for many years. While neighborhood character is important, private property owners should have a reasonable opportunity to develop land that has never been built upon, particularly when the proposal has been carefully designed and reviewed. The level of detail and professionalism in this application is reflected in the unanimous support provided by City Administration.

I recognize that change can be difficult, and that residents care deeply about their neighborhood. However, responsible and thoughtful development is essential to keeping our city healthy, vibrant, and sustainable. Preventing any use of long-vacant land risks sending the message that our city is closed to growth and investment.

An important aspect of this proposal is the inclusion of assisted living. Many long-time residents wish to remain close to family, friends, and familiar surroundings as they age. Developments like this help ensure our community remains inclusive and supportive for all generations.

I respectfully encourage the Appeal Board to review this project in detail, consider its merits and community benefits, and approve the proposed development as a positive step forward for our city's future.

Thank you,



R

November 12, 2025

RE- 4240-59th Street Proposed Supportive Living Accommodation

To the City of Red Deer Inspections and Licensing, Attention Jay Hallet

For our city to grow we need projects like this to move forward. Providing much needed Dwelling for our aging population. The ability to utilize space within our city needs to be taken advantage of. The location would provide a short commute for care services and other amenities in the downtown area. Access to City's trail system, almost at its front door. With costs rising for Construction and the City's current financial state this would also provide tax revenue as well as much needed living space. This project requires staffing, providing Employment within our city as well as possibly attracting Candidates from outside Red Deer. Our city needs to welcome investment that will only make our community stronger and attractive to work, live and retire within Red Deer.

January 26, 2026
Subdivision & Development Appeal Board

Attention: Lisa Nord, Board Clerk

I am writing to formally express my support for the proposed development at 4240-59 St, currently before the Board on appeal.

This project addresses several pressing community needs, including increased housing supply and the growing demand for assisted living options. It would allow seniors to remain in their community while also contributing positively to overall housing availability.

The development would also deliver tangible economic benefits, including the creation of local construction and trades employment, as well as long-term increases to the municipal tax base. Importantly, it achieves these outcomes through the use of existing infrastructure and without significant financial burden to the City.

The site has remained vacant for many years, and the proposal represents a thoughtful and appropriate use of the land. The level of planning undertaken and the unanimous support from City Administration demonstrate the merit of the application.

I respectfully encourage the Board to consider the broader community benefits and approve the development.

Sincerely,

A large black rectangular redaction box covering the signature area.

January 26, 2026

The City of Red Deer
Subdivision & Development Appeal Board

Attention: Lisa Nord, Board Clerk

Re: Letter of Support for Appeal – NO.SDA006 – 4240 59 Street Red Deer

I am writing to express my support for the proposed development currently before the Board. As a local resident/taxpayer who works in the trades, I see firsthand how projects like this directly support local workers and their families. Developments of this nature help keep skilled tradespeople, contractors, and suppliers employed within our community, rather than forcing them to seek opportunities elsewhere.

The proposal also offers important long-term value to the City. With municipal costs continuing to rise, it is ultimately taxpayers who bear the burden through increased fees and taxes. Developments that generate new tax revenue without placing additional financial pressure on existing residents should be encouraged. Responsible growth of this kind strengthens the City's tax base, helps support essential services, and demonstrates a commitment to balancing municipal costs while easing the burden on taxpayers.

Beyond the economic benefits, this development responds to real and growing community needs. Housing options remain limited, and there is an increasing demand for assisted living so seniors can remain close to family, support networks, and familiar surroundings. This proposal helps address both challenges in a practical and responsible manner.

Finally, the application has received unanimous support from City Administration, which further demonstrates the quality, compliance, and thoughtful planning behind the proposal.

I respectfully urge the Board to approve the development.

Yours truly,

[REDACTED]
[REDACTED]
[REDACTED]

January 26th 2026

Subdivision & Development Appeal Board

Attention: Lisa Nord, Board Clerk

January 26, 2026

Subdivision & Development Appeal Board

Attention: Lisa Nord, Board Clerk

I am writing to express my support for the proposed development currently under appeal. Given the ongoing pressures facing our city—including housing availability, increasing construction costs, and growing tax burdens—it is difficult to understand why a project offering clear public benefit has encountered so many barriers.

This proposal represents a responsible use of privately owned land within an established area, supported by existing infrastructure. It would contribute meaningful tax revenue, generate employment opportunities, and require little to no financial burden on the municipality. From an economic and planning perspective, this type of infill development aligns with the city's long-term interests.

It is also important to acknowledge the broader context. While community input is essential, opposition rooted solely in resistance to change—particularly when applied to land that has remained vacant for years—should not outweigh sound planning principles or the rights of a property owner to reasonably develop their land. The extensive work invested in this application is evident, and the fact that it received unanimous support from city administration speaks to its overall quality and merit.

I am concerned that policies such as the Area Restructuring Plan are being interpreted in ways that unintentionally discourage appropriate development, particularly when applied to properties that have never been developed and therefore have no established character to preserve.

The Appeal Board now has an opportunity to demonstrate that our city welcomes thoughtful, well-planned growth. I encourage you to consider the proposal carefully and in its full context, as I believe it would be a positive and constructive addition to the community.

Respectfully,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

January 26, 2026

Subdivision & Development Appeal Board

Attention: Lisa Nord, Board Clerk

I am writing to express my support for the proposed development currently before the Board on appeal.

As someone who understands the construction industry and the value of steady work, I see this project as a real opportunity for our community. Developments like this create meaningful employment for local tradespeople—carpenters, electricians, plumbers, equipment operators, concrete crews, and many others. These are good jobs that support families and keep money circulating locally. Turning away projects like this directly affects people who rely on this work.

Beyond jobs, this proposal addresses genuine community needs. Housing is becoming harder to find, and there is a growing shortage of appropriate options for seniors. Including assisted living in this development would help ensure that older residents can remain close to family and familiar surroundings, rather than being forced to leave the community.

It is frustrating to see a well-planned project face ongoing resistance when the site has been vacant for years and the application has received unanimous support from City Administration. This proposal represents responsible use of private land and a practical step toward strengthening the community.

I respectfully encourage the Board to consider both the economic and human impact of this decision and to approve the development.

[REDACTED]
[REDACTED]
[REDACTED]

January 26, 2026
Subdivision & Development Appeal Board
Attention: Lisa Nord, Board Clerk

I am writing to express my support for the proposed development currently before the Board on appeal. I previously lived in this neighborhood and still care deeply about the community and its future.

From my experience living there, I know how important it is for the area to grow in a thoughtful and responsible way. This project represents that kind of progress. It would provide much-needed housing, including assisted living options that would allow seniors to remain close to family, friends, and familiar surroundings.

The development would also bring meaningful benefits to the wider community. It would support local jobs during construction and contribute new tax revenue at a time when municipal costs continue to rise. Projects that strengthen the tax base without increasing the burden on existing residents are essential to the long-term health of the city.

The fact that this application has received unanimous support from City Administration speaks to the care and professionalism behind the proposal. In my view, this is the type of development that helps communities remain strong, inclusive, and sustainable.

I respectfully urge the Board to approve the development.

[REDACTED]

[REDACTED]

[REDACTED]

January 26th 2026

Subdivision & Development Appeal Board

Attention: Lisa Nord, Board Clerk

I am writing this letter in support of the proposed development. In a time when our city is facing a housing shortage, rising property taxes and costs of construction, I am bewildered with the challenges this development has faced moving forward. A developer has proposed a building that would provide, housing, development that would provide jobs both in construction and throughout operation. The development is in an existing neighborhood with existing infrastructure which would provide tax revenue to our city with nearly no cash investment from the city. The economics of this project work for our city.

The reality is, we find ourselves in a situation of “not in my back yard”, where the community association has shown over and over again they want nothing to be built on this private property. The land has been vacant for many years, but that should not mean that a private property owner should not be able to develop it. The care and attention to detail that was put into this application is seen by the unanimous support given by the city administration. It was disappointing to hear that the Area Restructuring Plan is being wielded by the neighborhood as a weapon to keep development away. I understand the requirement that views should not be changed, however I believe it should only be logical that this not apply to vacant lots that have never been developed.

The original decision at MPC has already sent out a clear message that this city is not open for development, and will not work with developers. The appeal board has an opportunity to start to change that narrative. I hope that the appeal board will take the time to review the development in detail, understand the merits of it, and how it would be an excellent addition to our city.

Thank you,



January 26, 2026

Subdivision & Development Appeal Board

Attention: Lisa Nord, Board Clerk

I am writing as a mother and community member to express my support for the proposed development currently before the Board on appeal.

I care deeply about the kind of neighborhoods we are creating for our children and families. Healthy communities grow and evolve, and thoughtful development plays an important role in keeping areas vibrant, safe, and sustainable. This proposal represents the type of positive investment that helps strengthen a neighborhood rather than leave it stagnant.

The project would provide meaningful benefits for the wider community. It would support local jobs during construction and contribute much-needed tax revenue at a time when municipal costs continue to rise. Responsible development like this helps support the services families rely on, without increasing the burden on existing residents.

The inclusion of assisted living is also an important benefit. It supports families who are trying to care for aging parents while keeping them close to loved ones, familiar surroundings, and community supports.

The unanimous support from City Administration reflects the quality and thoughtfulness of this proposal. I believe this development would be a positive step toward building a stronger, more connected, and more resilient community.

I respectfully urge the Board to approve the development.

Sincerely,

[REDACTED]

[REDACTED]



Red Deer
Construction
Association

December 12, 2025

**Subdivision and Development Appeal Board
City of Red Deer**

Re: Proposed Supportive Living Accommodation – 4240-59 Street, Red Deer

The RDCA remains committed to supporting this development and will continue to advocate for the meaningful growth and development required within the City of Red Deer. This proposed project represents a significant addition to the City's housing and care options for seniors, directly addressing the community's increasing need for accessible and supportive living accommodations.

It is important to note that this development received support from the City of Red Deer administration, which recommended approval to the Municipal Planning Commission. The proposed supportive living project reflects a well-designed, purpose-built, and compassionate investment for seniors and residents requiring accessible housing. Furthermore, the project fully complied with Administrations suggested modifications during the review process, demonstrating thoughtful planning and adherence to established municipal guidelines.

The development application exceeds standard zoning and procurement expectations by offering enhanced community benefits, including both indoor and outdoor amenity spaces, high-quality landscaping, and a clear commitment to environmental sustainability. The local developer has also emphasized the use of local capital, local skilled trades, and local economic benefit, ensuring that the community remains at the forefront of this project.

As a long-standing organization representing approximately 250 construction firms across Central Alberta, the Red Deer Construction Association respectfully encourages the Subdivision and Development Appeal Board to support this application.

Regards,



President

January 26, 2026

Subdivision & Development Appeal Board

Attention: Lisa Nord, Board Clerk

I am writing to express my support for the proposed development currently before the Board on appeal.

As someone familiar with the construction industry, I see this project as real opportunity for our community. It would provide steady work for local tradespeople and contractors—jobs that support families and strengthen the local economy. Turning away projects like this has real consequences for working people.

This development also addresses clear community needs. Housing is increasingly limited, and there is a growing demand for assisted living so seniors can remain close to family and familiar surroundings. This proposal helps meet both of those needs in a practical, responsible way.

Given that the site has sat vacant for years and the application has received unanimous support from City Administration, I believe this is a reasonable and positive use of the land.

I respectfully urge the Board to approve the development.

Sincerely,

[REDACTED]

[REDACTED]

To Whom It May Concern,

I am writing as a concerned citizen of Red Deer in support of the proposed seniors housing development.

This project meets the Waskasoo Area Redevelopment Plan, the Environmental Character Statement, and all City land use and environmental requirements. City Administration confirmed it will not materially increase traffic and complies with existing bylaws.

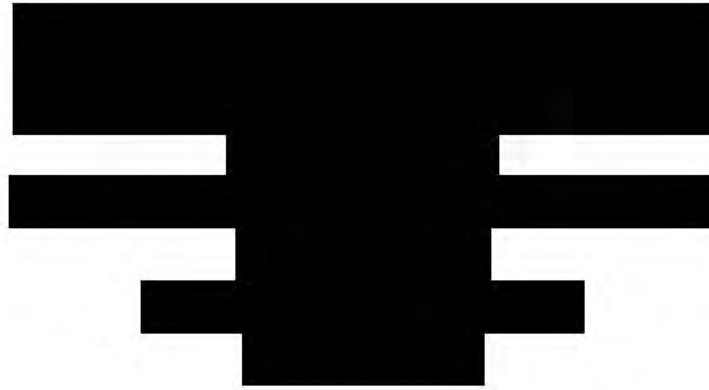
Red Deer is facing a housing shortage, particularly for seniors. The City's own Housing Needs Assessment shows that construction is not keeping up with demand, which will continue to worsen affordability if responsible projects like this are delayed or denied.

This development would provide needed seniors housing, create local jobs, and generate new tax revenue—helping the City grow without placing more tax pressure on residents.

I urge Council to reconsider this proposal and support a development that aligns with City policy and serves the broader community.

Sincerely,

[Redacted Signature]



January 26, 2026

January 26, 2026

Subdivision & Development Appeal Board

Attention: Lisa Nord, Board Clerk

I am writing as a resident who strongly supports the proposed development currently under appeal. Like many others in our community, I care deeply about the future of our city and the kind of place we are building for our families, seniors, and neighbors.

We are facing real challenges—housing is harder to find, costs are rising, and many people are being priced out of the community they love. This project represents a practical and positive step forward. It would bring new housing, generate tax revenue, and make good use of land that already has infrastructure in place, without placing additional financial burden on the city.

One benefit that deserves more attention is the impact this project would have on local jobs. A development of this size means steady work for local trades, contractors, suppliers, and service providers. Carpenters, electricians, plumbers, equipment operators, concrete workers, delivery drivers, and many others would benefit directly. That kind of economic activity supports local families and keeps money circulating in our community rather than leaving it. At a time when many people are struggling with rising costs and uncertain employment, turning away good-paying construction work seems short-sighted.

Another important aspect of this proposal is the inclusion of assisted living. Our community is aging, and more families are facing difficult decisions about where their loved ones can safely live. Many seniors want to stay close to the neighborhoods they know, near family, friends, and familiar services. Right now, there simply are not enough options locally. This development would help meet that need and allow more people to age with dignity in the community they helped build.

It has been frustrating to watch this project face so much resistance, especially when the land has sat vacant for years. While community input matters, opposition that seems driven primarily by a desire to prevent any change does not reflect the broader needs of the city. The level of care and effort put into this application is clear, and the fact that it received unanimous support from city administration speaks to its overall quality.

I believe we need to ask ourselves what kind of message we send when thoughtful, well-planned projects like this are rejected. Our city should be open to responsible development—

especially development that creates jobs, supports seniors, and strengthens the community as a whole.

I urge the Appeal Board to consider the full benefits of this proposal and approve the development.

Thank you!



December 12, 2022

To: Orlando Toews, Senior Planner

From: [REDACTED] Gaetz Lakes Sanctuary Committee

Re: Gaetz Lakes Sanctuary Committee response to the developer's request for feedback for the application to rezone 4240 59 Street from PS to R3, and to amend the *Waskasoo Area Redevelopment Plan (ARP)* to allow for the rezoning, to make optional the now required pre-development studies (geotechnical, bank stability, traffic, etc.) as well as to remove the property from its relevant character area.

While every developer believes they can sustainably alter the land for a housing development, the reality is that any alteration of the land will have negative effects on a myriad of environmental processes. Some of these alterations create challenges that rear their heads regardless of where the development takes place. Others are unique to 4240 59 Street.

Loss of Permeable Surfaces

While the existing schoolyard is not a natural environment, it is a permeable surface. Permeable surfaces allow for the slow, measured dissipation of rainwater and snowmelt by absorbing water, over a large area. This absorption prevents overland water flow and thereby reduces the opportunities for erosion.

Additionally, permeable surfaces allow for a measure of filtration. Rainwater and snowmelt can pick up a vast array of substances as it flows over the ground. Many of these - road salt and de-icing chemicals, oil and other lubricants, pesticides, and others - should not be flowing freely into our rivers and creeks. Permeable surfaces can act as a sort of pre-filter and reduce the load of these toxins in outflowing water.

By building on this land, the permeable surfaces are reduced. Building roofs, parking lots, driveways, and patios all act as physical barriers to permeable ground. These new hard surfaces concentrate water in a few locations and facilitate overland flow. This increased flow rate and volume increases the risk of erosion, placing the riverbank and riparian habitats at risk. Additionally, the increased overland flow loads the water with the previously mentioned substances and debris, carrying them to the river unabated and unfiltered.

Riverbank Stability

The Red Deer River has been increasingly threatened by development and subsequent erosion. There are numerous places along the river, through the city, where the bank has required armouring. The most visible examples are below Oriole Park West and below the houses along Cronquist Drive. Left to its own devices, the river would naturally erode the embankments creating natural cutbanks. The creation of these two neighbourhoods has necessitated the installation of the protection required to prevent the banks from eroding.

Bank armouring creates barriers to wildlife, removes potential spawning habitat, and interferes with the natural evolution of river systems. The proposed development is located on the outside of a bend in the river, as are the other two armored locations. Water flows faster at the outside of the bend, than at the inside. Our concern is that the development creates additional stresses on the riverbank, necessitating armouring. The extremely narrow nature of this habitat linkage heightens the importance of keeping native vegetation and riverbank function intact and unchallenged by development stresses.

Barriers to Wildlife

Corridor connectivity is critical to the protection of biodiversity. The Red Deer River is a regional artery of life, comprising nearly continuous riparian habitat along its banks from Fort Normandeau downstream to River Bend. Many organisms including plants, invertebrates, herptiles, mammals and birds move and thrive along this corridor. Perhaps one of the narrowest stretches of this corridor is along 45th Avenue – the site of this proposed development. This critical pinch point for the flow of biodiversity from south to north and east would certainly be impacted by the proposed development and the increased activity, traffic, impermeable surfacing, noise, lighting, and various other impacts that it would undoubtedly bring. Many of the wildlife species that presently move through this vital habitat linkage, especially the small ones that comprise the bulk biomass of biodiversity, are already at great risk due to the higher likelihood of roadkill that development would bring. Should development occur and traffic (foot and vehicle) increase, there would no doubt be greater impact. If anything, this narrow linkage should be widened and encouraged east to allow for the flow of biodiversity to and from the Gaetz Lakes Sanctuary and McKenzie Trails natural area. We support the current PS zoning and Open Space - Major long-term land use designation of the proposed development site as these designations support the health of the watershed, regional environment, and wildlife.

Trail Realignments

Depending on the design elements of a development, proposal trail connections may or may not be an increased threat. We would need to wait to see what the development proposal is before providing feedback on this element.

Increases in Traffic

Although this has already been touched on, with any increase in residential populations comes an increase in traffic, increased infrastructure, and development to accommodate that increased traffic, and an increased likelihood of wildlife/vehicle conflict. More cars equal more opportunity for negative interactions between wild animals and cars. Squirrels, foxes, deer, moose, weasels, chipmunks, beavers, hares, rabbits, snakes, salamanders all cross 45th Avenue on their way to the riverbank. As the number of cars increases, so does the possibility of animals being hit.

Increase in Pedestrian Traffic

Increased pedestrian traffic, especially with the extreme bottlenecking that we see along 45 Avenue, can also lead to more negative human/wildlife interactions. Increased foot traffic and everything that comes with it (light, noise, garbage, etc.) would restrict animal movement and potentially increase the number of vectors for invasive plant/species movement.

Light Pollution

Nocturnal and crepuscular (active at dawn and dusk) animals rely heavily on the dark for cover and concealment. Their vision is uniquely adapted to low light environments. Some animals rely on being able to see the night sky for navigation and wayfinding. Development lighting will create a barrier between the forest spaces around the perimeter and the feeding and watering areas (ponds, pond edges, shrubs, grasslands, riverbank, and river) located to the east and west of the property. Additionally, any lighting that is proposed along the escarpment will have similar effects on wildlife. The escarpment is a major wildlife corridor. Many deer, moose, foxes, coyotes, and birds rely on the cover of the riverbank forest for safe passage across to First Island. Lighting will be as effective at restricting nocturnal and crepuscular animal movement as would a physical fence. Artificial lighting also interferes with bird migration patterns; imagine the geese throughout Waskasoo Park never leaving.

We would recommend not installing lighting anywhere that crepuscular and nocturnal wildlife transit. The effect on wildlife movement would be too detrimental to justify its use. If lighting is absolutely required throughout the development, it should be well spaced with dark corridors between light pools. The dark spaces will create a path between the dark forest and the spaces beyond. Any lighting should be focussed on the trail (not spilling into the forest), downward firing, and shielded from above so as not to create light pollution in the night sky.

Invasive Plant Species

According to the Government of Alberta, 'invasive species' are "*non-native species that have been introduced, that threaten our ecosystems and biodiversity*" (AB Government definition, www.alberta.ca). To be classified as 'invasive,' a plant must cause harm to the other plants or organisms. Invasive plants can be harmful in many ways, such as by increasing in abundance so rapidly that they out-compete native varieties or by being poisonous to consume. These

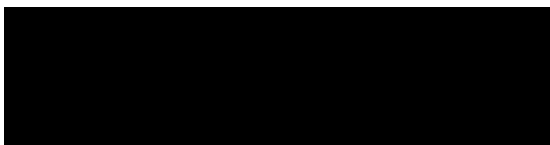
invasive plants are often generalists, which means they are able to grow on many types of landscapes and often thrive in challenging conditions such as in roadsides or disturbed areas. These are introduced plants that are not native to the area in question. The Alberta government has determined various levels of classification when it comes to invasive plants: Noxious Weeds require control and Prohibited Noxious Weeds require eradication.

Several invasive plants currently exist in the area and disturbance caused by development would certainly open the way for greater establishment of these species. A greater presence of invasive plants on the landscape not only threatens the surrounding ecology but it also requires significant resources to control or eradicate and these efforts are often required for the long-term; issues do not go away easily.


The Gaetz Lakes Sanctuary is already under significant threat by invasive plant species. Canada thistle, Cicer's milkvetch, toadflax, black henbane, and scentless chamomile already present significant management challenges requiring significant time, financial, and logistical resources every year. Any development adjacent to the Sanctuary will only add to these challenges.

In conclusion, the Gaetz Lakes Sanctuary Committee does not offer support to this proposal for rezoning/developing the 4240 59 Street parcel, but rather, the committee stresses the importance of protecting, conserving, and enhancing this vital ecological landscape linkage. Intact wildlife movement corridors, undisturbed soil structure and thriving plant and animal communities are a few of the vital elements that help to keep our urban ecosystems healthy and resilient.

Respectfully submitted,

A large black rectangular redaction box covering the signature of the Gaetz Lakes Sanctuary Committee member.A small black rectangular redaction box covering the name of the Gaetz Lakes Sanctuary Committee member.

Chair, Gaetz Lakes Sanctuary Committee



January 27, 2026

Red Deer City Subdivision and Appeal Board
4914 48th Avenue
Red Deer, AB T4N 3T4

Re: Appeal #SDAB 0262 006 2025

To Whom It May Concern

Re: Opposition to Proposed Zoning Change for Multi-Level Apartment Development at 45th Ave. Lookout

I am writing to express my strong opposition to the proposed zoning change that would permit construction of a multi-level apartment building by East Lincoln Properties near the 45th Avenue lookout. This development poses significant environmental, safety, and procedural concerns that warrant careful reconsideration.

Environmental Impact on the Red Deer River Corridor

The proposed location of this building across the south end of the lot directly adjacent to the 45th Avenue lookout represents a serious threat to our already compromised wildlife corridor along the Red Deer River. This corridor serves as critical habitat and a movement pathway for local wildlife, and further encroachment will only exacerbate existing pressures on these essential natural areas.

Additionally, the increased impervious surfaces from concrete and asphalt associated with this development will significantly increase stormwater runoff into the Red Deer River and Waskasoo Creek watershed. This poses risks to water quality and aquatic ecosystems that our community has worked hard to protect and preserve.

Traffic and Congestion Concerns

The addition of a multi-level apartment building will substantially increase traffic volume and congestion on 45th Avenue and the rural road access to McKenzie Lakes. These routes are already experiencing capacity challenges, and this development will further strain infrastructure without adequate consideration for traffic management and road safety.

Non-Compliance with Environmental Character Statements

I note with concern that this development does not meet the requirements outlined in the Environmental Character Statements contained within the City's Zoning Bylaw. These standards exist to protect the environmental integrity of our community, and any variance from these requirements sets a troubling precedent for future developments.

Inadequate Landscaping Plan

The previous application fell short of minimum landscaping requirements by 28 trees and shrubs. This deficiency further demonstrates the inadequacy of the proposal and its failure to meet basic municipal standards for environmental mitigation and aesthetic integration.

I am deeply troubled by the procedural handling of this application. City Council previously rejected this zoning change after hearing community concerns. When the developer reapplied, Council chose not to hear the subsequent application directly but instead referred it to city planning, effectively bypassing public input and disregarding the concerns of the citizens you were elected to represent. This approach undermines democratic process and erodes public trust in municipal governance. Now after a unanimous vote against their latest proposal rezoning is still being considered.

I respectfully urge Council to:

- Reject the current zoning change application
- Uphold the previous Council and Planning Commission decisions that reflected community concerns
- Ensure that any future applications for this site include meaningful public consultation
- Prioritize environmental protection and community well-being over development pressure

Our community deserves thoughtful, sustainable development that respects our natural environment, existing infrastructure capacity, and established planning guidelines. This proposal fails to meet those standards.

Thank you for your attention to this important matter. I trust that Council will carefully consider these concerns and act in the best interests of Red Deer residents and our shared environment.

[REDACTED]

[REDACTED]

[REDACTED]

November 13, 2025

Subdivision and Appeal Board

In reference to appeal number #SDAB 0262 006 2025

Re: Response to East Lincoln Properties appeal of the Municipal Planning Commission's (MPC) unanimous refusal of their application to build a 3-storey, 48-unit seniors apartment building along 59 St. Proposed Zoning Changes and Development Permit Application- 4240 59 Street

To Whom it May Concern,

The Gaetz Lakes Sanctuary Committee reports to Red Deer City Council and is charged with the protection of the Gaetz Lakes Sanctuary. The Committee's creation was a condition of the agreement that saw the Province of Alberta transfer the Sanctuary to City ownership in the 1980s. The Committee has Statutory authority over the Sanctuary. They are responsible for the implementation of the Gaetz Lakes Sanctuary Management Plan and provide guidance and direction to The City and to the Waskasoo Environmental Education Society.

While not directly notified of the application for a Development Permit by East Lincoln Properties for the lot at 4240 59 St, The Committee has an interest in commenting on the impacts of the development as they relate to the environmental health of the Sanctuary, and to the wider environment.

We echo the concerns shared by the Waskasoo Environmental Education Society, the Waskasoo Community Association (WCA), the Red Deer River Naturalists (RDRN), Camille J. LeRouge school, and other concerned citizens and groups. We thank the WCA for bringing this matter to our attention.

The Gaetz Lakes Sanctuary Management Plan (GLSMP)

The GLSMP was adopted in principle by Red Deer City Council October 7, 1997. This plan governs the activities in the Sanctuary and specifies how development around the Sanctuary should be done with minimal impact. The GLSMP is the instrument through which the Gaetz Lakes Sanctuary Committee directs WEES and provides input and guidance to The City of Red Deer.

45th Avenue is designated in the GLSMP as one of the three wildlife corridors - along with 67th Street and Cemetery Hill - supporting the Sanctuary that should be protected.

From the GLSMP, page 19:

“Wildlife corridors are believed to reduce mortality and habitat fragmentation for animals in areas of human development (Foster and Humphrey, 1995). The protection of wildlife corridors is critical for the long term utilization of the Sanctuary by ungulates and other animals. Without a means of entering and exiting the Sanctuary freely, wildlife populations may abandon the area in order to find more accessible places to reside”

Recommendations in the plan include the statements (both GLSMP, page 19):

- “Protect habitat along 45th Avenue”, and
- “Reforest/protect wildlife corridors at strategic locations”

Specifically “... a developer is required to protect existing wildlife corridors on designated lands” (GLSMP, Page 20). While this statement is specifically referring to the Michener Centre Outline Plan, the accompanying figure (Figure 1. Wildlife Corridors of the Sanctuary) clearly shows that the Red Deer River is designated as one of the wildlife corridors that support the Sanctuary.

Further, in the section titled *45th Avenue* (GLSMP, Page 22) it states

“Habitat along 45th Avenue consist of dense stands of saskatoon (*sic*) (*Amelanchier alnifolia*), wild rose (*Rosa woodsii*), white spruce (*Picea glauca*), *Populus sp* and willow species (*Salix spp*), which run parallel to the Red Deer River. These strips of habitat are extremely rich in food for a wide variety of species as well as providing cover for movement.”

In the section *Human Use and Influence* - Chapter 3, it states “Preservation of the Sanctuary from future developments is critical to the long term survival of the area” (GLSMP, page 48).

Landscapes at a Wider Scale

The Red Deer River Valley, the property at 45Ave and 59St, the Gaetz Lakes Sanctuary, and the East Hill Escarpment are all part of the same ecological system. Water flowing from the escarpment toward the river is utilised by the plants and animals along its flow. The fields on and around Gateway school and Parkland CLASS absorb that water and regulate its flow into the Red Deer River.

The reality is that the Sanctuary is being islanded. It is suffering “death by a thousand cuts”. Its connection to the wider system is being almost constantly negatively affected by surrounding, ongoing development. The Clearview Ridge subdivision created a barrier between the Hunting Hills and the Sanctuary. The Michener Extendicare facility sits on the headwaters of Gaetz creek; the facility has had drastic, negative impacts on the flow and quality of water into the Sanctuary. The building of 67St and the bridges across the river forced migrating deer and moose into tight corridors, breaking up the

natural north-south routes across ravine and upland areas. The ball diamonds, fencing, and parking behind both Parkland CLASS and Gateway school have forced animals north to the grasslands adjacent to 45 Ave, and south onto 59 St, before they can get back into the Gateway open areas.

The Sanctuary *needs* connection to wider landscapes. It needs to have safe ingress and egress routes for the animals that call it home and for those passing through. It needs to have its outflowing water slowed by permeable surfaces. It needs to have unbroken connections between the landscapes that support it - grasslands, escarpment, the river, and the interstitial spaces. Without these connections, the Sanctuary loses biodiversity, and biomass. By extension surrounding environments lose the ecosystem services the Sanctuary provides.

Permitting this development will further isolate the Sanctuary and place the plants, animals, and systems that depend on it, at further risk.

We are re-submitting our feedback from December 2022 and January 2025, as those potential impacts remain.

Loss of Permeable Surfaces

While the existing schoolyard is not a natural environment, it is a permeable surface. Permeable surfaces allow for the slow, measured dissipation of rainwater and snowmelt by absorbing water, over a large area. This absorption prevents overland water flow and thereby reduces the opportunities for erosion.

Additionally, the permeable surfaces allow for a measure of filtration. Rainwater and snowmelt can pick up a vast array of substances as it flows over the ground. Many of these — road salt and de-icing chemicals, oil and other lubricants, pesticides and others — should not be flowing freely into our rivers and creeks. Permeable surfaces can act as a sort of pre-filter and reduce the load of these toxins in outflowing water.

By building on this land, the permeable surfaces are reduced. Building roofs, parking lots, driveways, and patios all act as physical barriers to permeable ground. These new hard surfaces concentrate water in a few locations and facilitate overland flow. This increased flow rate and volume increases the risk of erosion, placing the riverbank and riparian habitats at risk. Additionally, the increased overland flow loads the water with the previously-mentioned substances and debris, carrying them to the river unabated and unfiltered.

There is no substitute for natural, permeable surfaces over large areas. Rainwater catchment, and planter boxes can help, but they lack the depth and breadth of open permeable land. It is this depth and breadth that protects surrounding land from erosion, and reduces the impacts of surface pollutants.

Riverbank Stability

The Red Deer River has been increasingly threatened by development and subsequent erosion. There are numerous places along the river, through the City, where the bank has required armouring. The most visible examples are below Oriole Park West and below the houses along Cronquist Drive. Left to its own devices, the river would naturally erode the embankments creating natural cutbanks. The creation of these two neighbourhoods has necessitated the installation of the protection required to prevent the banks from eroding.

The bank armouring creates barriers to wildlife, removes potential spawning habitat, and interferes with the natural evolution of river systems. The proposed development is located on the outside of a bend in the river, as are the other two armoured locations. Water flows faster at the outside of the bend, than at the inside. Our concern is that the development would create additional stresses on the riverbank, necessitating armouring. The extremely narrow nature of this habitat linkage heightens the importance of keeping native vegetation and riverbank function intact and unchallenged by development stresses.

Barriers to Wildlife

Corridor connectivity is critical to the protection of biodiversity. The Red Deer River is a regional artery of life, comprising nearly continuous riparian habitat along its banks from Fort Normandeau down stream to River Bend. Many organisms including plants, invertebrates, herptiles, mammals and birds move and thrive along this corridor.

Perhaps one of the narrowest stretches of this corridor is along 45th Avenue, right at the site of this proposed development. This critical pinch point for the flow of biodiversity from south to north and east to west would certainly be impacted by the proposed development and the increased activity, traffic, impermeable surfacing, noise, lighting and various other impacts that it would undoubtedly bring.

Many of the wildlife species that presently move through this vital habitat linkage, especially the small ones that comprise the bulk biomass of biodiversity, are already at great risk due to the higher likelihood of roadkill that development would bring. Should development occur and traffic (foot and vehicle) increase there would doubtless be a greatly detrimental impact on biodiversity.

If anything this narrow linkage should be widened and encouraged east to allow for the flow of biodiversity to and from the Gaetz Lakes Sanctuary and MacKenzie Trails natural area. Major long-term land protection and habitat-rewilding on the proposed development site would support the health of the watershed, regional environment, and wildlife. Placing a large, massed structure on this site will be detrimental to local wildlife and birds that depend on the Gaetz Lakes Sanctuary, the riverbank, and the spaces between them.

Trail realignments

Looking at the Site/Context Plan it is clear that the existing South Bank Trail will be intersected by another driveway. It cannot be understated that this section of trail is extremely well-used by pedestrians, cyclists, scooter-riders, and skateboarders. Neighbourhood residents out walking their dogs, commuters headed into and out of downtown for work, and children heading to and from school all make use of this section of trail. These users already have to contend with the driveway that serves Parkland CLASS and Gateway School. A second driveway is going to drastically increase the chance of negative human/automobile interactions. This is an insurmountable problem as there is no space to realign the trail to avoid this driveway crossing.

Increases in Traffic

Although this has already been touched on, with any increase in residential populations comes an increase in traffic, increased infrastructure and development to accommodate that increased traffic, and an increased likelihood of wildlife/vehicle conflict. More cars equals more opportunity for negative interactions between wild animals and cars. Moose, foxes, deer, squirrels, weasels, chipmunks, beavers, hares, rabbits, snakes, salamanders all cross 45 Ave on their way to the riverbank. As the number of cars increases so does the possibility of animals being hit.

Increase in Pedestrian Traffic

Increased pedestrian traffic, especially now that it would be bottlenecked, can also lead to increases in negative human/wildlife interactions. Increased foot traffic and everything that comes with it (light, noise, garbage, etc) would restrict animal movement and potentially provide increased vectors of invasive plant/species movement.

Light Pollution

Nocturnal and crepuscular (active at dawn and dusk) animals rely heavily on the dark for cover and concealment. Their vision is uniquely adapted to low light environments. Some animals rely on being able to see the night sky for navigation and wayfinding. Perimeter lighting will create a barrier between the forest spaces around the perimeter and the feeding and watering areas (ponds, pond edges, shrubs) located in the point bar. Additionally the lighting that is proposed along the escarpment will have similar effects on wildlife. The escarpment is a major wildlife corridor. Many deer, moose, foxes, coyotes, and birds rely on the cover of the riverbank forest for safe passage across to First Island. Lighting will be as effective at restricting nocturnal and crepuscular animal movement, as would a physical fence. Artificial lighting also interferes with bird migration patterns; imagine the geese at River Bend never leaving.

A facility of this size will generate a tremendous amount of light, regardless of a dark skies lighting plan. Residents' own unit lighting will not be shaded or downward-firing. This alone will create an increased light-pollution situation. The light pollution has two, seemingly counter-intuitive outcomes, with regards to wildlife. On the one hand, the

spilled light creates areas of vulnerability for prey animals. Prey animals depend on darkness for cover. On the other hand, spilled light is an attraction for many animals. It illuminates food and cover. Ground floor patios and associated bird feeders are a powerful attractant for urban wildlife, setting up possible negative interactions with people.

These hazards are in addition to the danger presented to the myriad songbirds and bats that live in this area. Interior lit spaces appear to have no barriers to entry. Birds and bats fly into window panes and injure themselves or die.

Invasive Plant Species

To be classified as 'invasive,' a plant must cause harm to the other plants or organisms. Invasive plants can be harmful in many ways, such as by increasing in abundance so rapidly that they out-compete native varieties, or perhaps by being poisonous to consume. These plants are often generalists, which means they are able to grow on many types of landscapes and often thrive in challenging conditions such as in roadsides or disturbed areas. These invasive plants are by definition introduced plants that are not native to the area in question. The AB Government has determined various levels of classification when it comes to invasive plants: Noxious Weeds require control and Prohibited Noxious Weeds require eradication.

Despite best education efforts, housing often brings along invasive plant species. These plants have a tremendous impact on the Sanctuary.

At the direction of the GLSC, the Waskasoo Environmental Education Society spends several thousand dollars every year, controlling invasive plant species in the Sanctuary. The cost of hand-pulling, spraying with vinegar and salt, and hiring a herd of goats runs to roughly \$24,000. A development of the type permitted under proposed rezoning would undermine our decades of efforts in the Sanctuary, potentially exposing it to increased invasive seed dispersal.

Several invasive plants currently exist in the area and disturbance caused by development would certainly open the way for greater establishment of these species and the negative impact to the landscape that this would cause. Undisturbed soil structure and thriving native plant communities are important elements of healthy and resilient ecosystems.

Taking a wider view, the GLSC supports the citizens and organizations concerned with the havoc that this development can wreak on the Sanctuary. For 101 years, since the Gaetz family entrusted the land to Red Deer citizens, the Sanctuary has faced natural and man-made threats. Often, citizens rallied to protect the Sanctuary. It is the Committee's sincere hope that the Municipal Planning

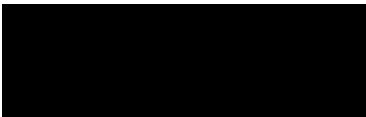
Commission and The City, understand that protecting the Sanctuary and the broader landscape that includes the Red Deer River; the East Lincoln property; surrounding grasslands, wetlands, and riparian areas; and the Waskasoo neighbourhood.

The Committee is concerned that should this development be approved, other future projects adjacent to Red Deer's natural areas would have precedence to lean on; other undeveloped areas would potentially face similar development threats. The GLSC shares the WEES position that some natural spaces need to remain natural. The piece of land at 45 Ave and 59 Street is one of those spaces where the value and importance to the environment is greater than any proposed building development.

Thank you for considering this feedback. The GLSC supports the excellent comments and feedback provided by the Waskasoo Community Association and Red Deer River Naturalists. It is the Committee's hope that this decision will be made with a conservation mindset of protecting the fragile riparian wildlife corridor and biodiversity linkage of the proposed development area.

We welcome the chance to walk the property, surrounding area, and the Sanctuary; and to have a frank discussion about the potential damage to the Sanctuary, to wildlife, to the river and its role as a wildlife corridor, and to the greater ecological systems and services at large.

Sincerely,



Chair, Gaetz Lakes Sanctuary Committee

cc: Waskasoo Community Association
Red Deer River Naturalists
Waskasoo Environmental Education Society

Attention: SDAB appeals@reddeer.ca

As a Waskasoo resident, the following concerns detail the reasons I am opposed to the proposed development. In general, my concerns focus on the fact that the Waskasoo neighbourhood will bear the cost of a series of negative externalities while the development as proposed offers minimum and undefined accommodations that appear to be designed to maximize profit rather than fit the character, use, and enjoyment of the neighbourhood as outlined in the Waskasoo Environmental Character Statement.

Concern #1: Increased Traffic

I am a resident of Waskasoo who enjoys an hour to 1.5 hours every day walking around the Waskasoo neighborhood with my dog. I purchased my property in this neighbourhood four years ago based on the design of the neighbourhood and the adjacent green spaces. Due to the influx of traffic from many sources (four schools, Festival Hall, Kerry Wood, Mackenzie Trails Park, and Red Deer maintenance yards dotted from Waskasoo to Mackenzie Trails Park), there are already times when the Waskasoo community is overrun by traffic. We might also predict that as the population of Central Alberta grows, so will the use and traffic associated with these facilities. However, these sources listed above are public facilities that serve the greater Red Deerian community. As a community minded individual, I am grateful for these facilities and accept the negative externalities that come with them. I plan my day accordingly, adjusting when I walk and when I leave for work around the worst of the traffic.

However, when faced with the idea that a for profit developer proposing high density housing will further impact me with the negative externalities of their property, increased traffic being one, I am hugely disappointed that this is being considered. If it must happen, the density of the housing should be lowered considerably with consideration to actually providing Supportive Living Accommodation. With this development and the increase in traffic, I am concerned that no amount of adjusting my schedule will allow me to enjoy a peaceful time in my neighbourhood.

Concern #2: Zoning and Discretionary Use for Supportive Living Accommodation

The list of amenities that allow this development to fall under Supportive Living Accommodation is questionable as there are no more amenities than a typical condominium unit. In fact, there are less. Most condominiums include a fitness centre, pet care for the majority of Canadians that own pets (one would assume if this is supportive living it will allow for pets), outdoor recreation such as tennis courts, communal spaces indoor and outdoor such as lounges, communal gardens, and patios. Apart from these spaces included as part of the condominium fees, there are often retail options as well such as salons, restaurants, and spas. From the list of amenities provided in the proposal, the only nod to Supportive Living Accommodation is to provide a homecare room. This homecare room is not defined in any way and seems like a very small accommodation for the developer to avoid going through the process of rezoning and simply a way to maximize profit. If this is homecare for 48 people, I would expect that it provides services that “support” residents 24/7 and allows for someone with higher needs than the average person to allow them to live comfortably in this residence. As an example, the below document speaks to providing safety and security to residents as well as one meal per day and housekeeping services. While the proposal is not for a licensed facility, the document offers some guidance as to what should be provided in the realm of support. As an example, given older individuals often have mobility issues which in turn cause safety issues related to falling, I would expect in a three story building for there to be an elevator, ramps, and lifts in this proposal to accommodate the 45% of Albertans 65 years and older that have mobility issues.

<https://open.alberta.ca/dataset/332fa291-c3c0-47d3-9fc7-21c77a1bfe42/resource/2becb068-2a69-4a65-8f67-2aeb7464161c/download/6861499-2013-licensing-supportive-living-accommodations-brochure.pdf>

Related to this, how will residents be selected for as requiring supportive living? How is a senior defined? Without this, it would be easy for a developer to call a development Supportive Living Accommodation and then just let any individual be a resident. This is an easy way to reduce the costs associated with actually providing supportive living.

For me, the lack of a detailed definition and accountability is a major concern for this and all developers in Red Deer that could potentially claim to offer some kind of supportive living. As a city that wants to and should meet the diverse needs of the Central Alberta population, we need to know that a developer is actually providing senior residences for those who need supportive living with actual support, not just another condominium. What is required of developers in this situation is precedent setting and needs careful consideration. I am concerned that down the line when all of these zones for that could provide Supportive Living are taken up by profit seeking developers, the City of Red Deer will have to purchase more expensive land to provide true Supportive Living units to our aging population.

Concern 3:

This development is very close to the river and if this was a natural area, there would be an expectation that there is a minimum 30m riparian zone between the river and the development. Given the existing 45th Street and sidewalk, the riparian zone is minimal, but the current open space of the school yard helps mitigate the impact. While we cannot change the road and sidewalk structures, any major development in this area should be required a set back that accommodates a realistic and functioning riparian zone that equates to a 30m continuous green space. Apart from accommodating wildlife habitat, it would help retain the character of the Waskasoo neighbourhood for the residents and the many visitors that come through this area to enjoy the bike and walking path that runs adjacent to the proposed development and to visit the MacKenzie Trails Park and the Kerry Wood Nature Reserve. Without this riparian space, this development substantially interferes with the use and enjoyment of this area.

Further to this, the range of “environmental considerations” proposed by the developer to ensure the development is as “sustainable as possible” is at best a minimum expectation given today’s options. If the developer is serious about “ensuring that the development as sustainable as possible” as stated, there are many more ways to be sustainable than just meeting the NECB requirements, putting up solar panels, and setting out some rain barrels:

- green building design and material
- an alternative to asphalt parking lots and lane ways such as engineered grid systems that allow for water absorption and ground water recharge that is important due to the proximity to the river
- using energy innovation to optimize efficiency in energy use

Thank you for your consideration,

██████████

January 27, 2026

Re: Appeal #SDAB 0262 006 2025

Dear Subdivision and Appeal Board Members,

Thank you for the opportunity to submit a response to East Lincoln Properties’ appeal of the Municipal Planning Commission’s decision to refuse a development permit for 4240 59 St. We value your time and ask you to forgive the length of this document; however, the application process allows us only one opportunity to voice our concerns, and we want to be clear and comprehensive.

By way of summary, the attached document details how the application’s proposed development:

- 1. Does not meet 4 of the 5 Waskasoo Area Redevelopment Plan Objectives.2
- 2. Does not meet 10 of the 17 applicable Character Statement regulations, which form part of the Zoning Bylaw and prevail over the Bylaws in the case of conflict.3
- 3. Does not fit the intent of the Public Service Zone.20
- 4. Does not fit the definition for the Supportive Living Accommodation Use.22
- 5. Does not align with the Municipal Development Plan’s Generalized Land Use Map and Policies.26
- 6. Will damage the environment.28
- 7. Will materially interfere and affect the value, use and enjoyment of neighbouring properties.36
- 8. Will unduly interfere with neighbourhood amenities.39

We request that you uphold MPC’s decision and deny this application for a discretionary use so the developer can engage with stakeholders to create a development plan that aligns with the Bylaws and statutory documents, preserves vital environmental features, and maintains neighbourhood character and amenities.

Our Summary of Concerns is followed by a copy of the Waskasoo Area Redevelopment Plan and Character Statements, as well as copies of past letters of opposition.

Sincerely,

[Redacted]
President
Waskasoo Community Association
[Redacted]
[Redacted]



January 27, 2026

Waskasoo Community Association's Summary of Concerns Regarding SDAB-0262 006 2025

Thank you for the opportunity to respond to the appeal of the Municipal Planning Commission's refusal of East Lincoln Properties' development permit application for a Senior Supportive Living Accommodation at 4240 59 Street.

This lot is extremely important to Waskasoo residents. Part of the schoolyard for the Red Deer County Riverglen School since the early 1960s, it was subdivided off in 2014 when the County moved their school to Penhold. At that point, the City of Red Deer invested tens of thousands of dollars in developing the Waskasoo Area Redevelopment Plan (ARP) and its Environmental Character Statement to ensure any development here fits the character, maintains the area's parks and open space, and preserves and maintains the environment. As stated by the City of Red Deer at the Alberta Municipal Government Board 2014 subdivision hearing, the City "would be working towards a development plan for the area which it believed would address and guide the future of the site" (Alberta Government, *Municipal Government Board*). The ARP is that plan.

This planning document was carefully created over two years of consultation and research by subject matter experts and area stakeholders including the Waskasoo community, City Departments and Committees, area schools and school boards, the Kerry Wood Nature Centre, Waskasoo Environmental Education Society, and the Gaetz Lakes Sanctuary Committee. The ARP and its Character Statements was passed by City Council in 2016.

Four years later, in 2020, the lot was purchased by East Lincoln Properties with all the ARP's recommendations in place. In 2022, East Lincoln proposed removing the lot from the



Environmental Character Area and rezoning the lot from Public Service (PS) to High Density Residential (R-H) in order to build a 120+ unit independent seniors living apartment complex with a four storey building facing 45th Ave. and the river and a three storey building, almost identical to the development applied for here, along 59th Street. See the image to the left taken from East Lincoln properties' 2022 rezoning proposal.

Facing serious opposition, the developer then applied instead to revise the ARP and character statements and rezone the property to R-H to build a two-phase development: phase one was the building facing 45th Ave and phase two the building on 59th St. Their application was refused unanimously by Council in 2023.

In 2024, after the passage of a new Zoning Bylaw, Supportive Living Accommodation became a discretionary use on PS land. This meant that East Lincoln Properties no longer needs to rezone the property or revise the ARP and could apply directly for a development permit. Therefore, in November 2025, they applied for a development permit for the building along 59th Street (former phase 2). That application, too, was unanimously denied, this time by the Municipal Planning Commission (MPC) primarily because it does not comply with the Waskasoo Character Statements, which are included in and prevail over the Zoning Bylaw.

The Waskasoo Community Association opposed this development application at MPC and we continue to oppose it in this appeal process because, for reasons outlined below, it still:

- Does not meet the intent, requirements, and policies of statutory plans and the zoning bylaw,
- Will negatively impact the environment, and
- Will interfere with the use, enjoyment, and value of neighbouring property as well as impact neighbourhood amenities.

STATUTORY PLANS AND THE ZONING BYLAW

I. WASKASOO AREA REDEVELOPMENT PLAN AND ENVIRONMENTAL CHARACTER STATEMENT

A. AREA REDEVELOPMENT PLAN

The development does not fit the intent of the Waskasoo Area Redevelopment Plan (ARP) as outlined by the ARP's objectives. These objectives are:

1. Ensure development and redevelopment of properties is sensitive to the existing neighbourhood character and pattern of development created by street design, lot sizes and distribution, mix of uses and general density of development.
2. Maintain Waskasoo's extensive parks and open space.
3. Preserve and maintain environmental, historical and cultural features.
4. Maintain and enhance trail and pedestrian connections.
5. Encourage the enhancement and maintenance of all properties. (s.2.1)

The proposed development does not satisfy four of the five objectives. As shown below, it is not sensitive to the pattern of street design or mix of uses and general density of development, does not maintain Waskasoo's open space, does not preserve and maintain environmental features, nor does it maintain and enhance trail and pedestrian connections.

At the May 4, 2023, Council hearing on whether East Lincoln Properties could revise the ARP to allow for a similar multifamily development (see image above), Council unanimously refused the application because, as Mayor Johnston noted, such a development was not compatible with the intent of the ARP as outlined in the ARP's objectives and that refusing the rezoning "still allowed for development, still allowed for owner rights, and still allowed for consultation and comment" (City Council Special Meeting Video, 4h11m).

B. ENVIRONMENTAL CHARACTER STATEMENT

As part of the Zoning Bylaw, the four Waskasoo Character Statements implement the ARP's broad objectives, each within a specific area. (The ARP and Character Statements are appended to this summary.) The proposed development is within the Waskasoo Environmental Character Area. (See the map from the ARP below.) Because the development does not support the ARP's broad objectives, it should not be surprising that it also does not align with the Environmental Character Statement's regulations.



The four Waskasoo Character Statements created by planning and other experts are each divided into three sections: a map, a description of the area's character (listed under "Context and History," "Common Forms and Scale of Buildings," "Common Building Materials," and "Other Common Elements") and a list of "Recommended Design Elements" that will maintain or enhance that character as the area continues to develop.

While the ARP is a statutory document, the Character Statements within it “are incorporated into and *form part of The City of Red Deer Land Use Bylaw*” (ARP, p. 9). Section 1.2 clarifies that “Character Statements are a planning tool that will be applied in conjunction with ... The City of Red Deer’s Land Use Bylaw to evaluate if an application maintains the character of the area. *Where the regulations in the Land Use Bylaw ... conflict with the Character Statements, the Character Statements shall prevail.*”

Correspondingly, the City of Red Deer Zoning Bylaw states:

The areas of Waskasoo and Woodlea have applicable Character Statements that define the character of the area and outline regulations establishing the design parameters to which a proposal for redevelopment in the area must adhere. The Development Authority *will use Character Statements in conjunction with the Zoning Bylaw to evaluate if an application maintains the character of the affected area. Where the requirements in the Zoning Bylaw conflict with the Character Statements, the Character Statements prevail (12.150.1.1-3)*

The site in question is subject to the Environmental Character Statement’s description of its distinct character and its recommended design elements or regulations. In the City of Red Deer Agenda Report supporting the development submitted to MPC in November 2025 (hereafter called the MPC Report), City Administration states that the development “demonstrates substantial alignment with the character statements” (p.14) and “a clear commitment to the intent of the Waskasoo Environmental Character Area” (p. 9) because it covers only 26% of the parcel and includes some green initiatives. However, these components satisfy only a small portion of the requirements and do not satisfy the full intent of the Environmental Character Statement.

First, we will look at the distinct character of the area and how the development does not complement or maintain that character.

Section 1.2 of the Character Statements states:

The Context and History, Common Forms and Scale of Buildings, Common Building Materials and other Common Elements sections within each Character Statement identify various aspects that add to the distinct character and should be considered when evaluating whether a proposed development compliments or maintains the character of the area.

The Common Forms and Scale of Buildings (s. 5.3) in this area are described as:

- Natural features including native vegetation, mature trees, and a minimal Building coverage
- Buildings are typically 1 storey with flat roof construction
- Gravel or asphalt parking areas with native naturalized Landscaping
- Two Heritage properties are located within this area: the Wishart Cabin Site within Gaetz Lakes Sanctuary, and the Allen Bungalow at Kerry Wood Nature Centre
- The natural and recreational areas tend to have few, smaller structures and park furnishing

Common Building Materials are listed as wood and stone (s. 5.4) and Other Common Elements (s. 5.5) include:

- Rural character with native, naturalized landscapes
- Rural road cross sections, a lack of fencing
- A wide-open sense of space that is not common in other areas of the City.

Following are images of ALL the buildings in the Environmental Character Area:

Kerry Wood Nature Centre and Shop



New KWNC Playschool,¹ Allen Bungalow, and shop



¹ Note the conservative size and height of the new playschool, its siting next to the KWNC to share parking and access and leave room for wildlife, and that it does not block views from 45 Avenue. Also, no trees were removed, and it will use solar and other green technologies.

Clearly, the architectural design, size, and mass of the proposed multifamily apartment building at three storeys or 12m tall, 22m wide, 82m long, and 5400m² (58,000 ft²) neither matches nor complements the Character Area's Form and Scale of Buildings.

The development also does not fit the character described in sections 5.3, 5.4, and 5.5 in that it impinges on the wide-open sense of space by locating the building where it fills the south face of the lot to the maximum extent (there is a right of way under the development's lawn bowling courts), its access road impinges on the rural road cross section, its architectural treatment of the building is overly urban, and the fencing is excessive.

C. RECOMMENDED DESIGN ELEMENTS

To maintain or enhance the area's distinct character as it redevelops, each of the character statements include Recommended Design Elements to be followed. Despite the name, these are regulations and use specific wording to determine the level of compliance necessary. Section 1.4 of the Character Statements states:

Character Statements that contain 'shall' are those which must be followed, 'Should' statements mean compliance is required but the Development Authority has some discretion based on the circumstances of the specific case. 'May' statements indicate that the Development Authority determines the level of compliance that is required.

The Environmental Character Statement has 17 such regulations. Below, we outline how 10 of the regulations are not met. The recommendations are examined in order of level of compliance necessary from absolute (Shall) to discretionary (May).

1. Mandatory Recommendations not complied with

a. Recommendation 5.6.2:

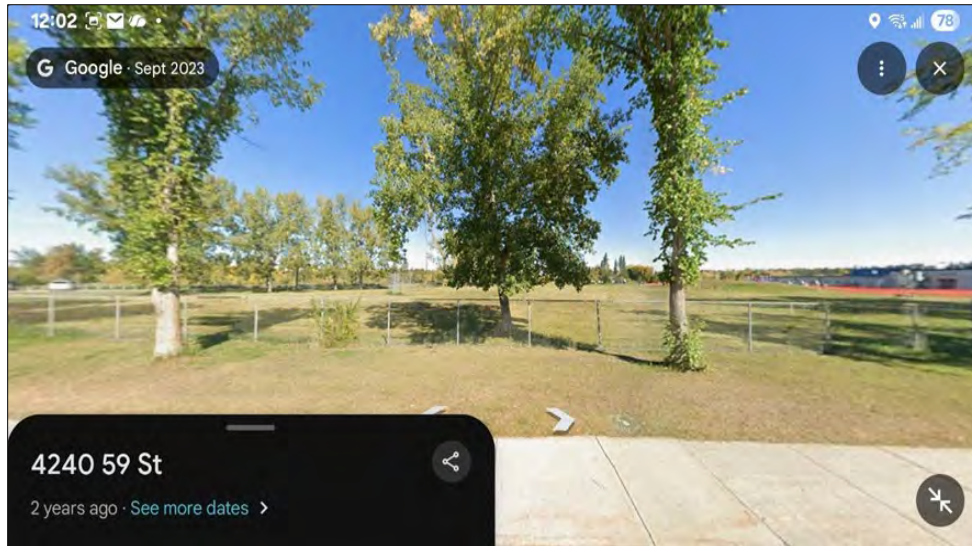
Mature street character, scenic Vistas viewable from the road, and existing natural features of the area shall be maintained

NOTE: Many of the Recommendations are complex statements and include more than one requirement. In this case, the regulation states that there are three features that any development must (shall) maintain: mature street character, scenic Vistas, and existing natural features.

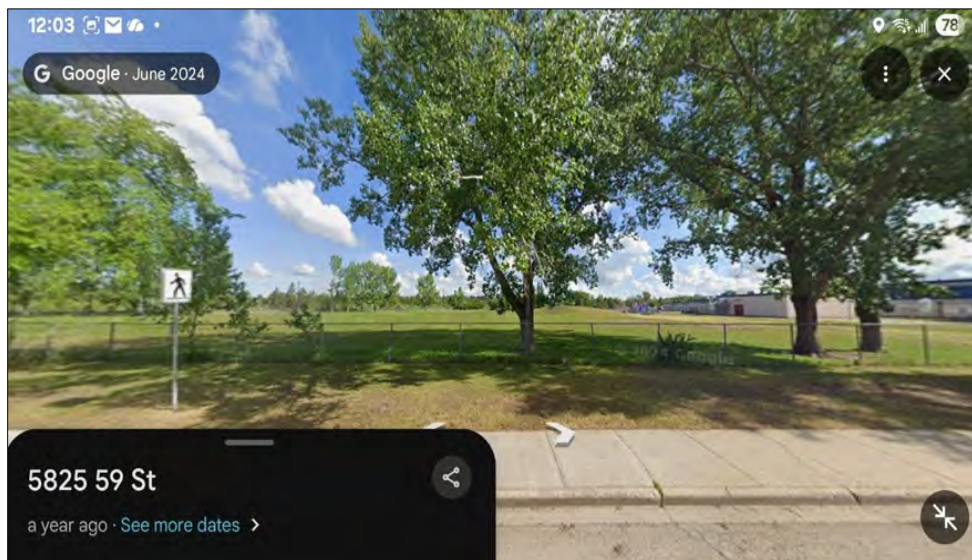
We begin by looking at the development's obliteration of scenic Vistas. The Waskasoo ARP defines Vista as "a scenic or panoramic view" (p. 25). As the Character Statement describes it, the view north from 59th Street is of a panoramic open space uncommon in the

city with mature trees and unobtrusive fencing in the foreground, the Red Deer River escarpment and South Bank Trail to the west, the rise of the Pines Hill to the north, and the forested slope of the river valley to the east. This scenic view is also framed at the north end of 44th Ave. See the images below and on page 38.

Views from 59th St



View to the north on west side of site



View to the north from intersection of 44th Avenue and 59th Street. All trees behind the fence will be removed.



View to the northwest from 59th St and 43rd Ave. Note the no parking signs along the sidewalk.

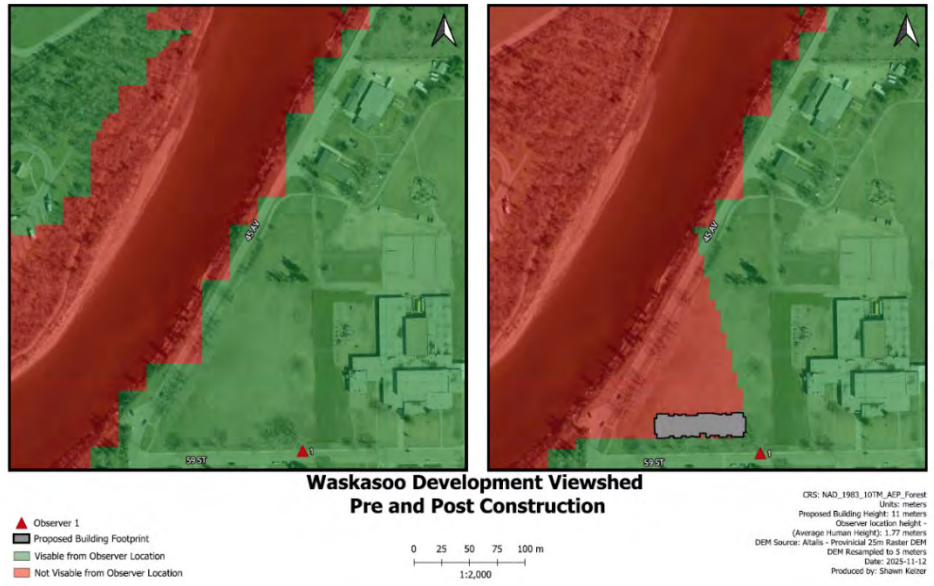
View North from 44th Ave



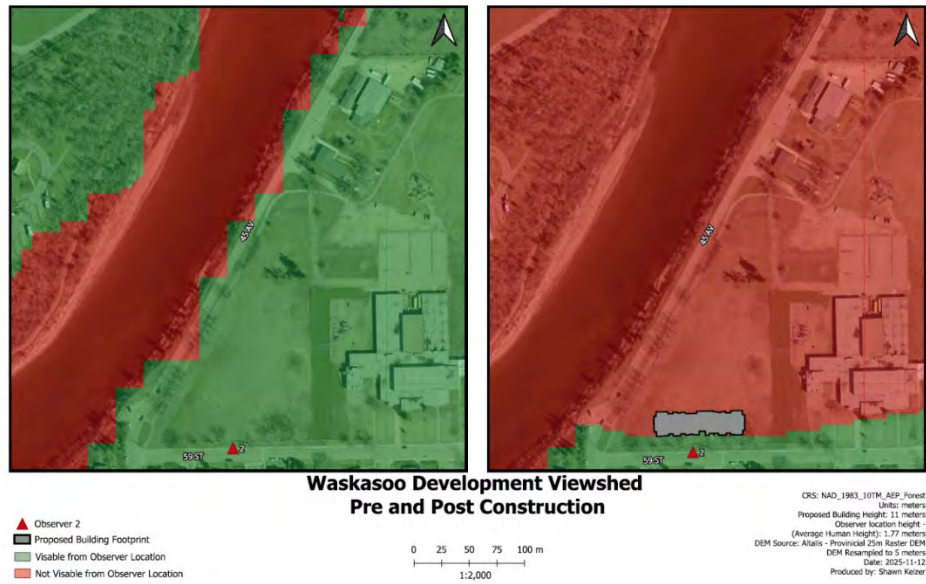
The City of Red Deer *Neighbourhood Planning and Design Standards* (NPDS) list best practices to be followed for both neighbourhood design and building permit applications. They note that designing neighbourhoods to preserve existing views and vistas lends character and a distinct identity to communities (s. 9, 9.2). It stands to reason that obstructing such longstanding views and vistas would then damage that same character and distinct identity.

Below is a viewshed analysis produced by Shaun Keizer, Consultant, Geospatial Insight, demonstrating the impact of the building on the views from the height of a pedestrian at three locations along 59 Street (red triangle). Green indicates what can be seen and red indicates what cannot be seen. For each location, both what is currently visible (left image) and what will be blocked by the building (right image) is shown.

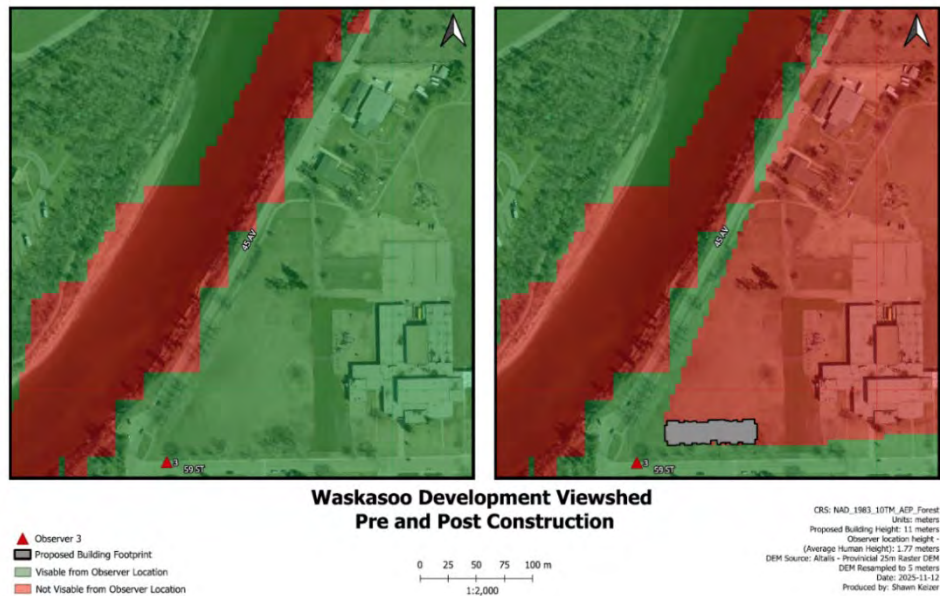
Location 1:



Location 2:



Location 3:

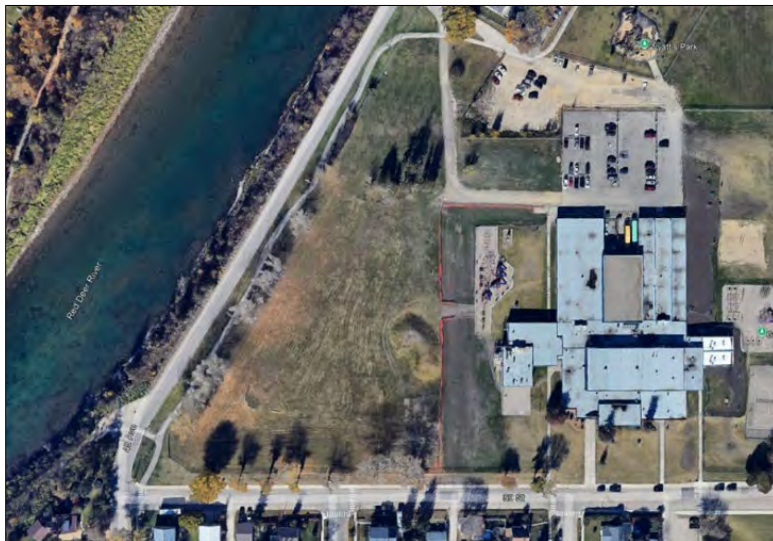


Clearly the 81m wide, three-storey apartment in this location will not maintain Vistas from the road. Note the complete obliteration of any views from the central location 2 and that from locations 2 and 3 even the Gateway School building next door is blocked from view because the proposed building is sited 17m closer to the street.

Just as the development does not maintain the Vistas from 59th Street, it also does not maintain the second requirement of this Design Element Recommendation: mature street character.

While the Zoning Bylaw uses the term Immediate Road Context to identify the existing urban streetscape that a redevelopment must complement, the Environmental Character Statement uses the term “mature street character” to encompass the variety of naturalized, rural, riparian, and urban landscapes that must be maintained.

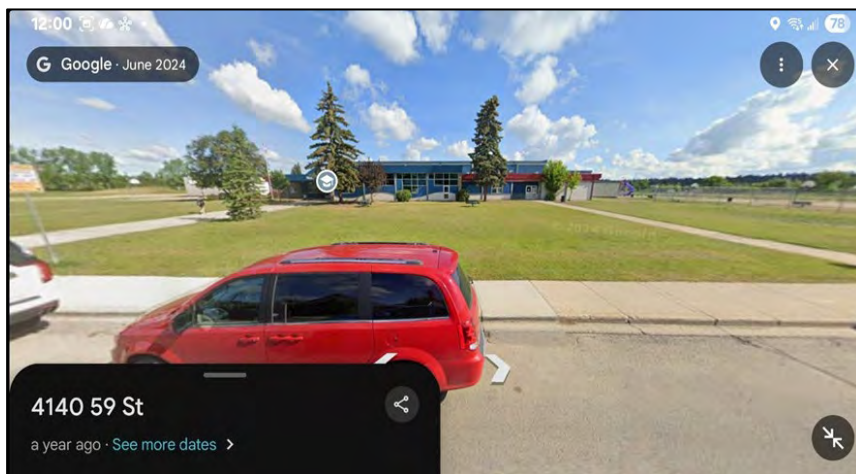
The proposed development is addressed to 59 Street which runs from 45 Ave to 42A Ave. The street character here consists of the views discussed above and Gateway Christian School on the north side and residential dwellings on the south.



Satellite image of the location.

45th Avenue runs along the river, 59th Street runs parallel to the bottom of the image and is intersected (from l – r) by 45th Avenue, a gravel lane, 44th Avenue and a gravel lane, 43rd Avenue and a paved lane. Area homes face the avenues.

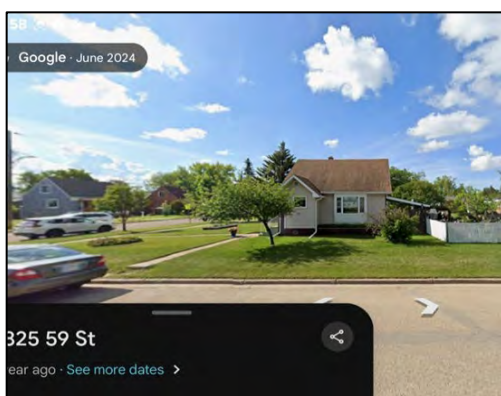
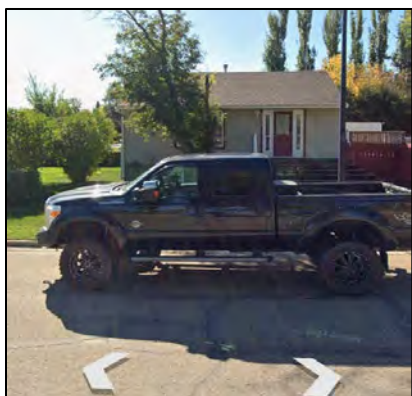
Gateway Christian School is a 1960's, single-storey school set back 30m from the curb with large open space side yards. While the gymnasium area is 10.2m tall, it is set well back from the front façade giving the impression of a low, non-imposing structure from the street as shown in the image below.



*Image of Gateway School
from 59th Street*

The south side of 59th Street consists primarily of Veterans Lands Act catalog homes that range from 57-68m² (615-730ft²) and are single storey bungalows or 1 ½ storey strawberry box homes with living space in the attic. These small, efficient homes were built for returning veterans in the 1940s and were placed on larger yards to supplement incomes with gardens. Because of the design of the neighbourhood, these homes front 44th and 43rd Avenues so the mature street character here includes the homes and their front and rear yards contributing to the open space feel of the mature street.

Images of VLA homes along 59th Street:



Below is an image of the (south) elevation of the proposed development:



Once again, at three storeys or 12m tall, 5400m² (58,000 ft²), and sited with its full 82m length across the south end of the lot, the apartment building will clearly dwarf the homes across the street. Further, because it will be sited approximately 17m closer to 59th Street, it will also dwarf Gateway School.

The architectural design is also not in keeping with the street character. Its style is the same as what is being built on Residential High Density (R-H) lots in new neighbourhoods like Capstone and Timberlands, and just as Waskasoo's 1940's VLA homes would look out of place in those neighbourhoods, this urban modernist apartment block does not maintain the mature character of the streetscape here.

Lastly, the development flouts any attempt to maintain street character by presenting its backside, including its service door, to the street. By doing so it not only does not complement the Mature Street Character where all structures either front or side onto 59th Street but also isolates the development from the neighbourhood. This orientation also does not comply with the City's best planning practices as outlined in the *Neighbourhood Planning and Design Standards* which state that all residential development should front the street (s.9.9).

In the MPC Report, proponents of the development state that the apartment's massing and siting "are designed to fit its existing streetscape" (p. 3) and later that the form and siting of the building "help ensure that the development fits within the existing streetscape" (p. 15), but nowhere do they detail exactly how the building fits the streetscape of 59th Street. Instead, in a section entitled "Neighbourhood Compatibility," the report attempts to show how the development fits what it calls the "neighbourhood context" (p. 9) described as "institutional sites (schools)" and the site's "surrounding context" described as parks and trails, three schools, the Memorial Centre, the RCMP detachment, and the Armoury (p. 10). Of these, only Gateway Christian School is located along and contributes to 59th St.'s mature street character. Lindsay Thurber and Camille schools are located on 42A Ave, the Memorial Centre is on 58th St, and the Armouries and RCMP detachment are on 55th St. (See map on page 45 below)

Surprisingly, the 75-year-old homes across the street are completely ignored in the proponent's evaluation of "surrounding" and "neighbourhood" character. These homes are in the A-20 Army Camp Character Area and while many original Victory Homes remain, those that have been and will be redeveloped are guided by the A-20 Camp Character Statements which maintains this unique area's streetscapes by encouraging large setbacks and limiting building additions of more than 30% to the rear of the existing structure. As noted above, the proposed modernist apartment building does not complement these homes now, nor will it into the future.

Finally, as well as vistas and mature street character, the third component of Recommendation 5.6.2 that must be maintained is the natural features of the area. The MPC Report implies that this entire complex Design Element Recommendation is satisfied solely because “all onsite trees removed for construction will be replaced” (p. 9), but even this part of the Design Element is not fulfilled. Removing mature trees and replanting saplings of a different species in a different location is not “maintaining natural features.” (See next section below.) Additionally, open space is also a natural feature which is why the Environmental Character Statement describes the existing natural features in Section 5.3 as “native vegetation, mature trees, and a minimal Building coverage.”

b. Recommendation 5.6.13:

Existing specimen conifer and deciduous trees shall be identified on a site plan and protected during site construction activities and after by ensuring buildings, services or hard surface areas are not sited too close.

This mandatory requirement is also not met. Four mature trees are proposed to be removed because the building and lawn bowling courts are sited too close to 59th Street. While according to the developer one of the trees needs to be removed for safety reasons, the others are in fair or good condition. These are the largest trees along the south side of the property and will provide the most privacy screening for any development – particularly until new plantings can get established.²

c. Recommendation 5.6.16:

Location, style, and amount of fencing proposed around and/or adjacent to open space areas shall have consideration for the movement of wildlife ...

This final mandatory Design Element Recommendation is another complex statement with three required elements for fencing to achieve the intent of considering wildlife movement in this key corridor: location, style, and amount.

So far, proponents have only addressed the style of fence and state that the fence must comply with the zoning bylaw, not be more than 5 ft tall, not have sharp edges, and demonstrate that wildlife can safely scale the fence to access the river valley (MPC Report, 12). While these conditions are helpful to the movement of large species like deer, this area

² We note that when redeveloping the Waskasoo Playground, the City was very clear that the Waskasoo Community Association had to do everything possible to avoid harming the nearby poplar trees and their root systems. Judging by size and relative appearance, these trees are likely the same age or older than the one's proposed to be removed here. While the trees on 4240 59 St. are privately owned and not municipal trees, we mention this to show that old poplar trees are still considered to be an important natural feature and neighbourhood amenity.

is also a corridor for less agile species that can not scale a five-foot fence, for example porcupines, skunks, and beavers. For these species, the location and amount of fencing is as important as the style.

Fencing for this development is only needed between the development and Gateway School to keep children safe from traffic on the property. The rest of the lot should be unfenced to allow movement of all types and sizes of wildlife. If the developer feels fencing is necessary for security, the fence line should be moved closer to the building to leave a significant portion of the site open to wildlife movement through the wildlife corridor.

2. Discretionary Recommendations not complied with

The word “*should*” in a Design Element Recommendation means that compliance is required but the Development Authority has some discretion based on the circumstances. The following three such statements have also not been met.

a. Recommendation 5.6.6:

Permeable and semi-permeable paving surfaces should be provided to improve ground water recharge and reduce storm water runoff.

All ground surfacing proposed in the application is non-permeable asphalt or brushed concrete. Proponents argue that this recommendation is still satisfied because stormwater is collected from ground surfaces and discharged into the city’s storm water system (MPC Report 16). However, this solution addresses only one of the two intentions of the design element. Storm water runoff is eliminated BUT along with it so is any opportunity for ground water recharge.

The design element recommends permeable or semi-permeable paving surfaces because this open field is key to recharging the area ground water that protects against drought and contributes to the health of the river and the Gaetz Lakes. (See discussion of Hydrologically Sensitive Areas below.)³ Nor is this design element specific to Waskasoo. The city-wide best practices laid out in the NPDS also encourage “low impact development (green roofs, rain garden, permeable surfaces, etc.) to help absorb stormwater, reduce heat gain ... and provide urban wildlife habitat” (s. 7.11).

³ Note, the MPC Report stated that this requirement is also met because water from the roof is collected in rain barrels or discharged onto the landscaping. However, the treatment of roof runoff is the subject of a separate design element (5.6.7).

b. Recommendation 5.6.9:

*All roads north of 59th street within the character area should maintain their natural boundaries and native vegetation to preserve and enhance the wildlife corridor through this **critical area** adjacent to the Red Deer River.*

Because there is already access to the site from the shared access road with Parkland Community Living and Support Services (PCLASS) and Gateway staff parking to the north, the new access road from 45th Avenue north of 59th Street will needlessly disturb at least 16m of the boundary, likely require a culvert, and impact the wildlife corridor adjacent to the river with additional pavement and an additional location where wildlife will be at risk in this “**critical area** adjacent to the Red Deer River.”

c. Recommendation 5.6.15:

New development should not adversely affect the character of the streetscape, as a result of being sited too close to the road, of inappropriate or excessive Massing form or height having a negative impact on abutting properties in terms of shadows and privacy/overlook, or causing the loss of landscape features or other factors which may have a negative effect on the streetscape or abutting properties.

This Design Element Recommendation is particularly complex, so we have broken it down into its component parts below:

New development should not adversely affect the character of the streetscape, as a result:

- a. Of being sited too close to the road,*
- b. Of inappropriate or excessive Massing, form or height having a negative impact*
 - i. on abutting properties in terms of shadows and privacy/overlook,*
 - ii. or causing the loss of landscape features or other factors which may have a negative effect on*
 - 1. the streetscape or*
 - 2. abutting properties.*

Numerous elements here should not impact the character of the streetscape. In the MPC Report, proponents for the development focus only on two: 1. that the development will not cast shadows or impinge on the privacy of abutting properties and 2. that Lindsay Thurber and Camille schools on 42A Ave, the Memorial Centre on 58th Street, and the RCMP detachment and Armouries on 55th St create an “institutional” “feel of the area” (p.11) and are similar to the development’s proposed height.

We repeat: while these institutions are in Waskasoo, they are not part of the streetscape of 59th St. Further, if the intention of the Area Redevelopment Plan and the Council that passed it was for development on 4240 59th St to match or compliment the character of these structures, the site would have either been omitted from any character area (as some areas are) or included in a character area with those structures. Instead, after two years of consultation and careful deliberations, 4240 59 St was included in the Environmental Character Area with the Gaetz Lakes Sanctuary, Kerry Wood Nature Centre, and a Craftsman-Style heritage home.

It is also curious that the height of the institutions to the east and southeast is used to justify the 12 m height of the development, but the front setbacks, a key component of this Recommendation (see clause a. in the breakdown above), are not compared. These other large institutional structures have correspondingly large front setbacks: Gateway is setback approximately 30 m, Lindsay Thurber 60 m, Memorial Centre 75 m, and Camille 31 m from the curb. Gateway School, however, is part of the development's streetscape, and any development on 4240 59 St should at minimum be setback the same distance (30 m).

Besides distance from the road, this regulation is also concerned with the impact of excessive massing, form, or height on “landscape features” and “other factors” in the streetscape. We have shown above that the massing, form, and height have negative impacts on the streetscape by dwarfing nearby buildings, an overly urban and modern design, and siting the building to back onto the neighbourhood.

d. Recommendation 5.6.3:

Buildings should be designed to include environmentally sustainable design features by incorporating the use of green technologies, Ecological Design, water conservation measures.

Yet, again, the developer and Administration oversimplify this recommendation. Yes, the development includes green technologies and some limited water conservation measures (rain barrels), but it does not incorporate elements of Ecological Design, defined in the ARP as “any form of design that minimizes environmentally destructive impacts by integrating itself with living processes. Ecological Design is an integrative ecologically responsible design discipline” (p.31).

The siting of this building along 59th St does not follow Ecological Design principles. While it covers only 26% of the site, which 26% of the site that is covered is equally important. To integrate with living processes in this “critical area adjacent to the Red Deer River,” the 26% of the site used should be located along the east property line and setback from the street at least as far as Gateway School. In this way, the west, north, and south portions would

contribute to the adjacent and abutting open space contributing to the living processes of wildlife movement along the river and between Gaetz Lakes and the river and preserve as much of the living process of the area's hydrologically sensitive area as possible. (See page 29 below)

3. Undetermined Recommendations not complied with

There are also two Design Element Recommendations that do not have a "Shall, should or may" qualifier and one fully discretionary recommendation that are not met.

a. Recommendation 5.6.10:

Shared driveways are encouraged. Other reductions in impervious surfaces may be achieved through the elimination of curbing and the use of decorative pervious surfaces for sidewalks, driveways, and trails.

Proponents for the development state that the development's driveway meets this requirement because "the location has been approved by The City of Red Deer and will need to comply with The City of Red Deer Contract Specifications" (MPC Report 10). The argument that various character statements are met because the development complies with other city standards and procedures is found throughout the MPC Report. However, the character statements were developed to refine those standards and procedures to meet the ARPs objectives for Waskasoo. In other words, if City standards and procedures were adequate, the Area Redevelopment Plan and Character Statements would not have been needed.

The Contract Specifications and Engineering Design Guidelines have few standards relevant to a multi-family driveway intersecting a rural road with the design parameters of an alley and no curb or gutter. They also do nothing to address the intent of this Recommendation which is to reduce impermeable surfaces in the Environmental Character Area. It is exactly for these kinds of situations that the character areas were created.

Any development here should share the access drive used by Gateway School and Parkland CLASS staff. In doing so, run off from paved surfaces would be minimized (as would additional trail hazards, and disturbance of the rural road and wildlife corridors).

b. Recommendation 5.6.1:

A conservation development pattern which clusters a development's built form together into a portion of the overall area allowing the open space of the development to contribute to the existing adjacent open space and be an amenity to the site users including wildlife...

Yet again, proponents for the development miss the intent and complexity of the recommendation and state that the development meets this recommendation because it covers only 26% of the lot (MPC Report, p.8). As argued above, which 26% of the lot is covered is just as important for the site to contribute to the adjacent open space and to be an amenity to wildlife and site users.

Any development on the lot should not only be conservative in size but also sited on the east side with a front setback at least equal to that of the abutting school. In this way, the open space will contribute to that of the front schoolyard and the municipal reserve, trail system, and riparian zone and be an amenity to both wildlife in the wildlife corridor and site users including those accessing the view amenity.

Again, this recommendation is applied city-wide best practice. The NPDS state that “Site design should incorporate elements to protect and enhance riparian zones” (s. 1.9) and “Property boundaries and buildings should be aligned to retain and preserve significant ... natural capital” (s. 1.10).

c. Recommendation 5.6.12

Excavated material may be used for the creation of berms or to provide a low-fertility soil for the creation of wildflower meadows or similar semi-natural habitats to blend with the more naturalized character of the area.

Proponents argue that this discretionary Recommendation is satisfied by exploring the idea of using the excavated soil to build a snow hill for Gateway’s children (MPC Report p.14). While this is a kind gesture, it again misses the intent of the recommendation which is to create semi-natural habitat for flora and fauna.

While proponents argue in the MPC Report that the development “demonstrates substantial alignment with the character statements” (p.20), “a clear commitment to the intent of the Waskasoo Environmental Character Area” (p. 9), “meets or exceeds the majority of the applicable Waskasoo Character Statements” (p. 94), and “meets and exceeds most design recommendations within the Waskasoo Character Statements” (p. 95), the development clearly does not. We have shown above that this application does not meet 4 of the 5 objectives of the Waskasoo ARP, does not align with important character components of the Environmental Character Statement, and does not meet 10 of the 17 Character Statement’s Design Element Recommendations which, despite the name, are regulations.

However, you need not rely solely on our opinion. In January 2022, the developer met with numerous City department managers and officers in a Pre-Development Meeting for a proposed development on this site called Riverglen Village. Very similar to what was later

refused by City Council in the May 2023 rezoning application, by MPC at the November 2025 development permit application, and what is before the SDAB today, the proposed development is described in the summary as “a three-storey hybrid assisted living facility on the south side of property with a four-storey building on the west (river) side consisting of 122 units ... Mainly independent living with the opportunity for additional services.” (City Council Special, p.93). City Department comments collected in a City of Red Deer meeting summary included:

- PS Zoning – setbacks and maximum height are not defined under the land use bylaw. The main concern will be compatibility with the neighbourhood.
- Waskasoo ARP will be a guiding document for the development.
- The siting of the building along 45th Avenue and 59 Street removes the contributing factor to the adjacent open space to the west. The site is closed off by having the building sited on the corner. It is the Development Officer’s opinion that [Character Statement recommendation 5.6] is not met.
- Inappropriate form – there are no other large scale buildings in the neighbourhood.
- Loss of landscaping features and closing the site to the west trail and river.
- Joint access with the north is preferable. (City Council Special, p. 93-100)

As Mayor Jeffries stated at the 2025 MPC Hearing, “It’s very clear ... the character statements have not been upheld” and that if the development permit were approved, it would be a decision regretted for years (Cowley).

II. ZONING BYLAW

Just as the application does not comply with the ARP and Environmental Character Statement, it also does not comply with its zoning district. The site is designated Public Service (Government and Institutional) or PS. Once again, proponents state “the application meets or exceeds all the requirements of the PS Zoning” (MPC Report, p. 94). However, in the discussion below we show that the development application cannot fit the regulations and does not fit the intent of the zone or the definition of the Supportive Living Use.

A. PS REGULATIONS

The PS Regulations in the Zoning Bylaw are presented in the screenshot to the right. As shown, all setbacks and landscaped areas; the site plan; relationship between buildings, structures and open space; architectural treatment of buildings; provision of architecture and landscaped open space; and parking layout are subject to the Development Authority's approval.

9.40.4 PS Regulations Table	
Category	Regulations
Floor Area	Supportive Living Accommodation minimum: 23.0m ² per unit
Front Yard Setback	Subject to Development Authority approval
Side Yard Setback	Subject to Development Authority approval
Rear Yard Setback	Subject to Development Authority approval
Landscaped Area	Subject to Development Authority approval
Loading Spaces	Subject to Development Authority approval
9.40.5 The Site Plan, relationship between Buildings, structures and Open Space, architectural treatment of Buildings, provision and architecture of landscaped Open Space, and Parking layout will be subject to Development Authority's approval.	

These regulations are in place for all

PS lots, not only those with character statements. We assume these broad powers are given to the Development Authority because PS land is found in every neighbourhood where developments on it are typically the most prominent (e.g. hospital, schools, community buildings, and recreation structures) and contribute substantially to the neighbourhood's character and residents' sense of place. Development applications on PS zoned land, particularly in residential areas, need to be carefully vetted for neighbourhood 'fit' and impact.

While proponents state that the application meets or exceeds all the zone's regulations, that can only be determined by the Development Authority, now the SDAB. Further, as was stated by City staff in the 2022 Pre-development Meeting, in the absence of specific regulations in the PS zone, "the main concern will be compatibility with the neighborhood," and the "Waskasoo ARP will be a guiding document for the development."

B. PS INTENT/PURPOSE

The development application also does not meet the intent of the current PS (Government or Institutional) Zone.

The City is part way through phasing in a new Zoning Bylaw. Phase One included a review of the Residential, Commercial, and Industrial Zones, as well as the Use definitions. Changes made to these areas of the Bylaw were passed by Council in 2024. Among the Use definition changes, the previous *Assisted Living* use (defined as providing "professional care or supervision or ongoing medical care, nursing or homemaking services" for people with "chronic or declining conditions") was replaced with the *Supportive Living Accommodation* use (defined as "intended for the permanent Residential living where an operator also provides or arranges for on the Site services to assist residents to live

independently or to assist residents requiring full-time care”) (Land Use Bylaw 1.6; Zoning Bylaw 37). Therefore, because assisted living was a discretionary use in the PS zone in the old Bylaws, and because assisted living was replaced with supportive living accommodations in the Use definitions in the new Bylaws, supportive living accommodations is now a discretionary use in the PS Zone.⁴

This use change went unnoticed during the public consultations and public hearing on the many changes made in what was presented as Phase 1 of the Bylaw Review and ultimately approved by Council on the understanding that Phase 2 would address changes to the other zones including PS. That the impacts to the PS zone were not examined by the public, City Council, or City Administration is evidenced by the fact that even by third reading no one had noticed that Gambling had been added and Education had been removed as uses in the PS zone.

Importantly for our argument here, however, is that nothing else in the PS Zone has been changed because the PS Zone is scheduled to be part of Phase 2 of the Bylaw Review which has not yet happened. As was stated in the “Summary of Changes in the Zoning Bylaw” presented to City Council for Second and Third Reading of the new Zoning Bylaw, the PS land use category and others “have not undergone a comprehensive review. A full review of these Zones will be completed in a later phase of the Land Use Bylaw project” (Agenda Report, April 29, 2024, Appendix B-02). At the April 29, 2024, Council hearing, Mayor Johnston, in fact, asked Senior Planner Mr. Girardin directly whether there were any material changes to the PS Zone. Mr. Girardin replied that there were no material changes to the zone and that “we have changed many of our use classes, and we have tried to match up to what was there before. It’s not a one-to-one but it is the closest match possible Narrowing and broadening ... will impact all the zones because we don’t have two different sets of use classes for old zones and new zones are the ones that received a comprehensive review” (City Council Meeting Video, 7h37m). Therefore, while the Use definitions were traded, nothing else has been materially changed including the regulations discussed above and the intent or purpose of the PS Zone discussed here.

That purpose or intent of the PS (Institutional or Government) Zone is given in the Zoning Bylaw as: **“This Zone provides land for uses that are public and quasi-public in nature”** (s.9.40.1). The MPC Report supporting the development would seem to agree when it describes the intent as “to provide land for public and quasi public uses” (13) and states that the “current PS Zoning ... contemplates institutional and quasi-public uses on this parcel” (15). This proposed development is neither.

⁴ Note: On January 13, 2026, Council requested a review of the Supportive Living Accommodation use definition with the goal of making it more restrictive e.g. requiring specific services. See next section.

Leaving aside whether this 55+ rental apartment building is “institutional,”⁵ it is clearly not public or quasi-public. The Zoning Bylaw does not define “public and quasi-public” but does state that words not defined “should be given their plain and ordinary meaning as the context requires” (s.1.40.5).

Turning to the Oxford English Dictionary (OED), “public” is defined as: “In general, and in most of the senses, the opposite of private” and “(of a service, amenity, etc.) provided by local or central government for the community and supported by rates or taxes” (Oxford). “Quasi-public” is not listed in the OED; however, “quasi” as a prefix to an adjective is defined as “*almost, nearly, virtually*” (Oxford).

That this is the sense intended for “public” and “quasi-public” in the context of the Zoning Bylaw is supported by the current Zoning Bylaw’s definition for **Public Property** as “all lands owned or under the control of The City” (24) as well as by the definition given in the previous Land Use Bylaw: “**Public and Quasi-Public** means any governmental or similar body and includes an agency, commission, board, authority, public corporation or department establishment by such a body” (1.16)

This development application does not fit the PS zone’s intent. It is for a 55+ seniors’ rental apartment (see section below) that is managed and wholly owned by a private company (East Lincoln Properties), run for their sole profit, and unlicensed or unregulated by, or in any way connected to, a public body or board. It is neither public nor quasi-public in nature.

C. PS USE DEFINITION

We also question whether this development conforms to the Supportive Living Accommodation definition as: “a use that is intended for the permanent Residential living where an operator also provides or arranges for on the Site services to assist residents to live independently or to assist residents requiring full-time care.”

Proponents imply that the building’s room that might be used by visiting home care aides and room that might be rented to a visiting hairdresser meets the requirement of “an operator arranging for on the Site services.” However, East Lincoln Properties is not themselves arranging for these services. They are acting as a building manager, not a service operator. The tenants themselves will arrange for their own home care aides to visit

⁵ There is no definition of “institutional” in the bylaws, but the Oxford English Dictionary defines it in this sense as: “Of or relating to a facility which *provides long-term residential care* to people *with specific needs*, such as children, elderly people, or people with physical or mental illnesses; (sometimes) designating negative effects which may be experienced by people placed in such facilities. Also: designating a person residing in or confined to such a facility.”

their apartments and will make their own haircut appointments. Further, the simple provision of these two rooms does not “assist residents to live independently.” Home care provides the same services in any type of dwelling (homes, apartments, condos etc.), and if renters here must provide their own groceries, cook their meals, access off-site services without a nearby bus, and monitor their own health, they are surely independent enough to go to a barber.⁶

A plain reading of the Bylaw makes clear that the intent is not to permit just any kind of multi-unit housing in PS zones. If to qualify as Supportive Living a development requires only a room which is available for lease by a hairdresser, or for drop-in sessions with home-care aides etc., this provides an inexpensive loophole route to developing just about any sort of apartments or condos in PS zones. Further, without any regulatory body monitoring it (which would be needed if the residents required care), this use would be exceedingly difficult to enforce.

The ambiguity of the definition of Supportive Living Accommodation in the Zoning Bylaw has resulted in City Council unanimously passing a resolution at their January 13, 2026, meeting to “direct Administration to bring forward a report by May 2026 reviewing the definition of supportive living accommodation, evaluating options to increase on-site support requirements, and providing recommendations for amendments to the Zoning Bylaw” (City Council Meeting Video 2h26m). We note that if this development application is passed and then Council increases the requirements for on-site support, this development will be non-conforming.

We are absolutely not against these types of private, for-profit, multi-family seniors housing communities, but they are lifestyle choices, not supportive accommodations, and certainly not supportive accommodations that are public or quasi-public in nature.

D. DEVELOPED AREAS REGULATIONS

The Zoning Bylaw’s Developed Areas Regulations (s.3.190) lay out additional regulations for residential developments in already built-up areas of the city. In the MPC Report, proponents turn to the Developed Area Regulations, which seem to indicate the development should only be two storeys tall, and argue that a three-storey height does not conflict with these regulations.

They then go on to say that, other than the regulation limiting height, “the Developed Areas Regulations appear largely compatible with the proposed development” (p. 8) and later that the development “meets or exceeds all the requirements of ... the Developed Areas

⁶ As a community member noted, she once lived in an apartment with a communal kitchen, social room, an on-site manager, and a gazebo, and she had no idea she was living in Supportive Living.

Regulations” (MPC Report p.94). Yet these regulations include bylaws to maintain street character and privacy and none of these are met. For example, the regulations stipulate that front yard setbacks must be within 1.2m of other structures on the street (s. 3.190.4.1.1), primary entrances must face the front boundary of a site (s. 3.190.7.1), balconies cannot be over 1.0m above grade (3.190.6.5), and include multiple bylaws regarding window placement “to minimize overlook into living spaces and rear yards” (s.3.190.6.4.).

All of this is moot, however, because the Developed Areas Regulations apply only to “Residential Sites, except in the R-H Zone and R-MH Zone” (s. 3.190.1.1). In other words, they are meant for redevelopment of low-density dwellings among other low-density dwellings. This development is on a PS site. The Developed Areas Regulations do not apply but stating that the application complies with them implies that the development fits the streetscape and makes an effort to maintain neighbour privacy.

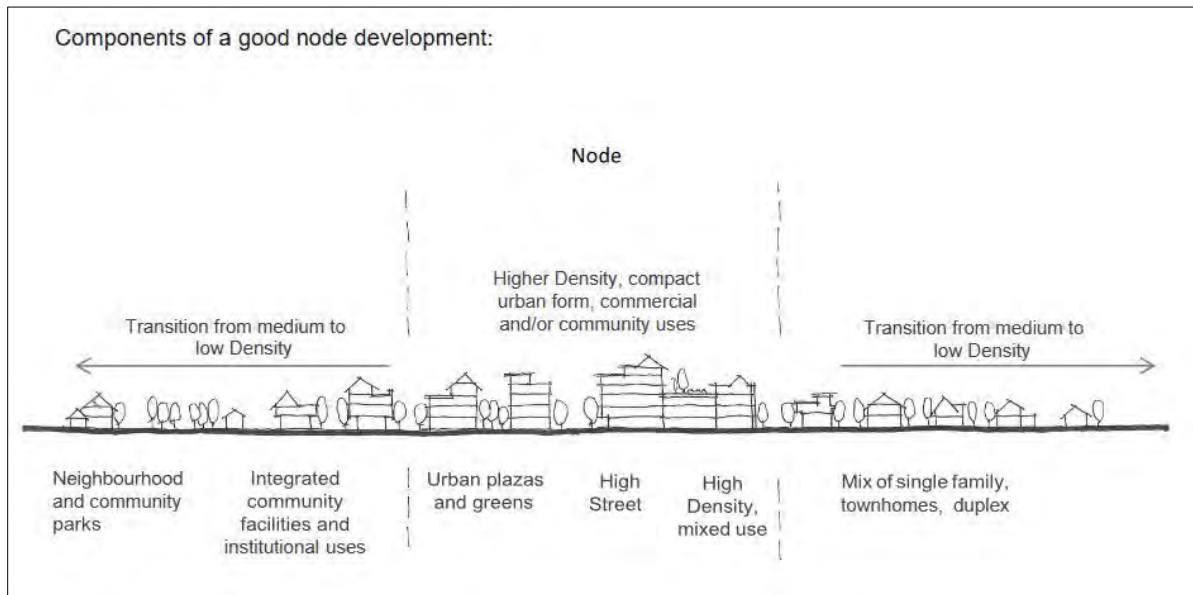
E. SPECIFIC USE REGULATIONS

Section 4 of the Bylaws outlines additional regulations for specific uses, and so far City Administration reports have not mentioned the specific use regulations for Supportive Living Accommodation applicable to this application. The Bylaw states:

- 4.270.3 In a Zone where a Supportive Living Accommodation is listed as a Discretionary Use, the Development Officer may consider factors such as:
 - 4.270.3.1 proximity to other uses that impact traffic and Parking;
 - 4.270.3.2 location on the block and in the neighbourhood;
 - 4.270.3.3 and the Road classification.

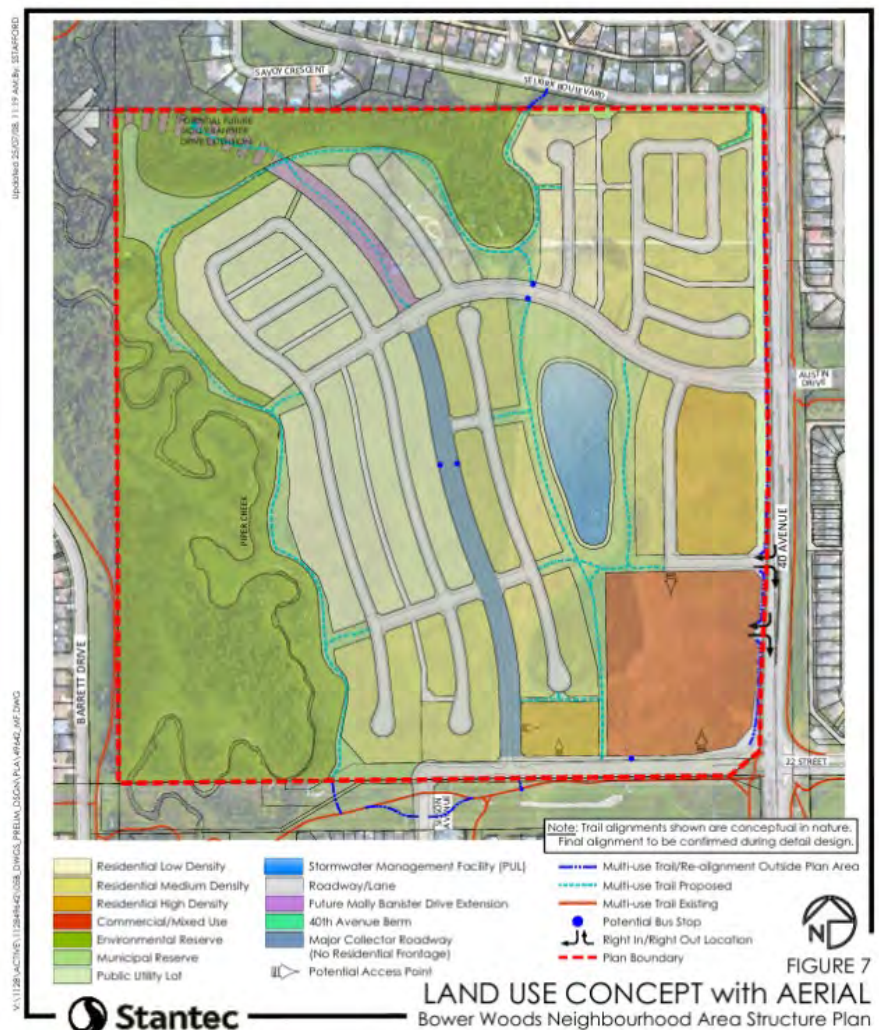
Other uses in proximity that increase traffic and parking as well as the road classification are discussed under “Amenities of the Neighbourhood” below. Here we focus on the location of the development in the neighbourhood.

The City’s NPDS design neighbourhoods around what they call a neighbourhood “node” defined as “a mix of uses (medium to high Density residential, mixed use, commercial, green space, community or recreational facilities) co-located together in one area ... that serves the neighbourhood and potentially surrounding areas” (p. 13) and locates high density residential next to transit and other services (s 4.2). As shown in the following graphic from the NPDS, neighbourhoods should be designed so that higher density development is located near the services and infrastructure of the node and slowly transition to lower densities as distance increases away from the node.



A good example of planning around a Neighbourhood Node is found in the Neighbourhood Area Structure Plan for Melcor's new Bower Woods neighbourhood in SE Red Deer (pictured to the right) where the high-density residences (orange) are located next to the commercial area along the 40th Avenue arterial (burnt orange) and the low-density areas (pale yellow) are at the back of the neighbourhood next to the environmentally sensitive Piper Creek escarpment.

In Waskasoo, 55th Street on the south end of the community, with its commercial sites, churches, transit, arterial road classification, mix of residential density, and green spaces, is the community's neighbourhood node. This is where our high-



density residential already exists because it is where it is appropriate.

The proposed multifamily development's location at the back of the neighbourhood, on the opposite end from the node, will disrupt density patterns (which also counters the first objective of the Waskasoo ARP), and locate these apartments in an area without services including transit. The result will be increased traffic through the neighbourhood adding to critical traffic issues created by other high traffic uses and inadequate road classifications in the area. See Traffic and Parking below (p. 41).

III. MUNICIPAL DEVELOPMENT PLAN

In addition to not complying with the ARP, Environmental Character Statement, and Zoning Bylaw, the development also does not comply with the Municipal Development Plan (MDP), which envisions how the city will develop until 2035 and to a population of 150,000 - 185,000 (s 1.1). Like the SDAB, the MDP is tasked with fulfilling the intent of Section 617 of the Municipal Government Act. Therefore, under "Role of the Plan," the MDP states, "The MDP guides and directs future growth and development for Red Deer, ensuring orderly, economical and beneficial development while balancing the environmental, social and economic needs and desires of the community" (s 1.1). This application does not conform to the site's generalized land use or with the MDP's Section 10, "Housing and Neighbourhood Design."

A. GENERALIZED LAND USE

The MDP's Generalized Land Use Concept Map identifies the long-term land use pattern for broad areas of the city. These general uses are divided into Residential, Commercial, Industrial, Public Service, and Open Space – Major.

According to the Land Use Map, the long-term land use for 4240 59 St and the land surrounding it is Open Space – Major, described as "the existing and proposed areas that make up the major elements of Red Deer's overall open space system" including "both private recreation areas like golf courses and public lands managed by The City" (MDP 4.0). It is land carefully set aside to improve quality of life; draw tourism and economic investment; and maintain and support the health of the watershed, regional environment, and wildlife (see s. 6.4, 9.0, and 14.0). It is not underutilized land ripe for intense infill.

Below is a portion of the Generalized Land Use Map with 4240 59 St indicated by the red star.



The Open Space - Major general land use pattern is consistent with the Environmental Character Statement's recommendations on preserving the area's open space, vistas, rural qualities, hydrology, and wildlife corridors. In the same ways the development does not comply with these recommendations (See "Recommended Design Elements" above), it does not fulfill the generalized land use for the area. Nor will it compliment future surrounding land uses in the Open Space – Major or Environmental Character Area.

B. HOUSING AND NEIGHBOURHOOD DESIGN

The MDP's general policies and land use map are "refined and implemented" (MDP 19.5) through more specific statutory documents and the land use bylaws. Thus MDP Policy 7.1 states that the City "should prepare and adopt design guidelines for areas with special characteristics, opportunities, and problems to exercise greater design controls" including "older neighbourhoods experiencing development pressures."

Proponents of this development tend to turn to MDP Policy 10.9 which, in part, states that "Intensification shall be encouraged in established neighbourhoods through residential and mixed-use infill projects." However, they tend to ignore Policy 10.9's qualifying statement that follows: "unless otherwise determined through an approved ... area redevelopment plan" (MDP 10.9). As an "older neighbourhood experiencing development pressures" and with "special characteristics" and "problems," Waskasoo has an approved area redevelopment plan and the intensification proposed by this development application does not conform to that plan.

Proponents have also turned to Policy 10.3 which require neighbourhoods to have “a mix of housing types and forms in all residential neighbourhoods” to “avoid excessive concentration of any single type of housing.” Having been built up over 125 years, Waskasoo already has a variety of housing types (including single family, secondary suites, multiplexes, condominiums, and apartments) and price points. Further, the extensive research for the Waskasoo Community Plan revealed that the neighbourhood also already has an abundance of rental opportunities. Apartment units comprise 319 or 58% of the 552 total dwelling units and when secondary suites and semi-detached units are added 62.5% of the dwellings in Waskasoo are multifamily (Waskasoo Community Plan s 6.0). Waskasoo has a plethora of rental units at a variety of price points where anyone, including 55+ seniors, can and do live.

So far, we have discussed the ways in which the development permit application does not comply with various regulatory and statutory documents surrounding land use including the Waskasoo ARP, Environmental Character Statement, various sections of the Zoning Bylaw, and the generalized land use and neighbourhood design sections of the MDP. In the following section, we examine how the development permit application also does not comply with the intent of Part 17 of the Municipal Government Act to “maintain and improve the quality of the physical environment within which patterns of human settlement are situated” (MGA s. 617).

THE ENVIRONMENT

The *MDP* describes Red Deer as a “community with a unique natural environment preserved and enhanced by careful community planning” (s. 3.0) and states that “Environmental and ecological management and the development of Red Deer as an environmentally sustainable and responsible community *is a priority*” (emphasis added, 9.0). Because of the development’s siting in Red Deer’s Open Space – Major system and proximity to the Red Deer River, Gaetz Lakes, and Waskasoo Creek, it will negatively impact the physical environment.

Once again, you need not rely on our opinion. We refer you to submissions made by the following organizations: the Waskasoo Environmental Education Society, Gaetz Lakes Sanctuary Committee, Red Deer River Naturalists, and the Red Deer River Watershed Alliance. These are well-respected organizations that work closely with The City to establish and implement Red Deer’s environmental goals and policies. We also refer you to submissions from the following highly qualified local experts: Ron Bjorge (M.Sc., Certified Wildlife Biologist and former Director of Wildlife for Government of Alberta);

Myrna Pearman (Canadian Geographic Fellow); and Chris Olsen (Professional Biologist (retired), former Instructor of Environmental Sciences, Lakeland College, Vermillion).

These local experts know the site and the environmental context surrounding it. They have often walked, ridden, driven, and boated by this area. Many do so daily. They understand the site's singular importance as well as its importance in the larger environmental context. They also understand the impacts of careless development on both. On the other hand, the applicant has supplied Vegetation, Wildlife, and Hydrology Assessments that, for the most part, are based on maps and satellite images and focus primarily on the impacts of the development within the boundaries of the parcel and not on the larger environmental contexts in the critical area. Below we discuss the impact of this development on two of those broad environmental contexts: hydrology and ecology.

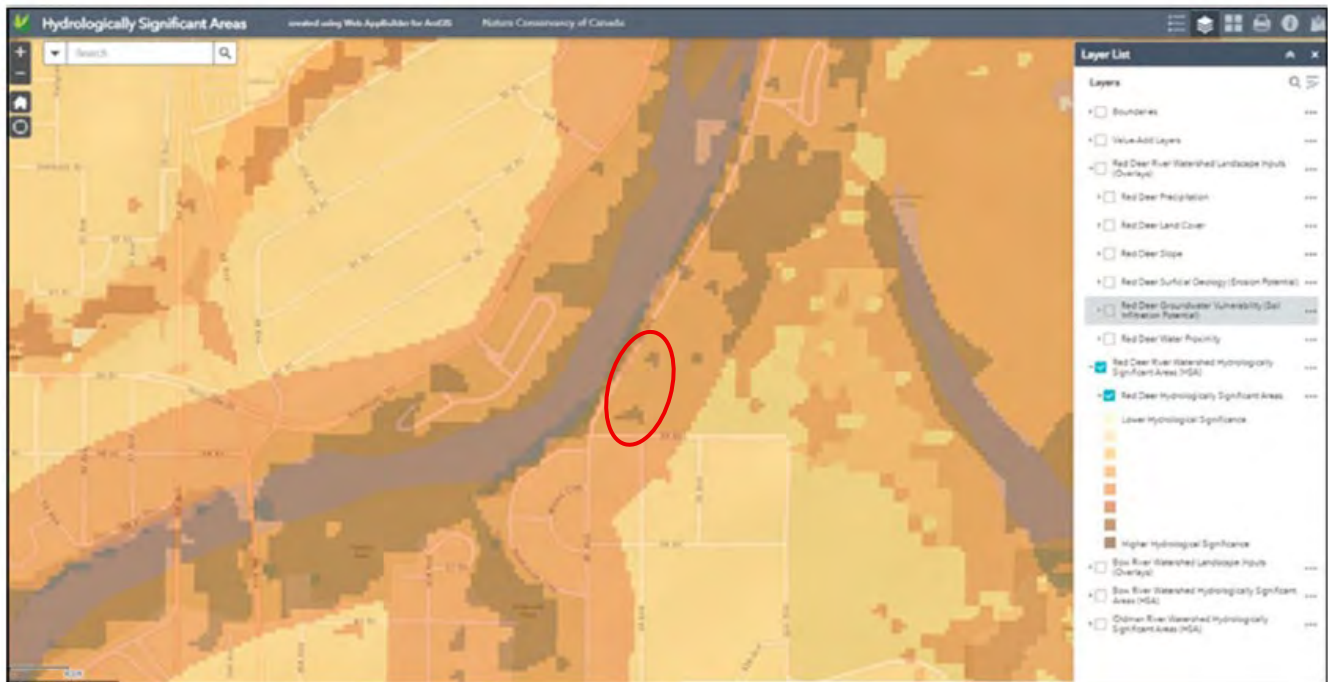
I. HYDROLOGY

The importance of this site to local hydrological systems was established in 2019. Building off a report entitled *Prioritizing Hydrologically Significant Natural Assets*, the Nature Conservancy of Canada and the Red Deer River Watershed Alliance (RDRWA) published a map of what they call Hydrologically Sensitive Areas (HSAs) in the Red Deer River watershed. HSAs have “natural assets that, if preserved in a natural state, provides beneficially hydrologic services such as water provision, flow regulation, and water purification” (RDRWA “New”). They support “water quality, flood mitigation and drought resiliency” (RDRWA “New”).

The RDRWA explains that “understanding and protecting HSAs is a key strategy for ensuring ... safe, secure water supplies and healthy, resilient ecosystems,” and the map, they explain, is to be used for “supporting municipal and provincial land use planning” (RDRWA “New”). It is particularly important since Section 18.2 of the *MDP* states:

The City shall participate in the activities of the Red Deer River Watershed Alliance in order to promote the effective integration of the management and use of land and water resources to ensure a legacy of ecological integrity and economic sustainability throughout the Red Deer River watershed. A key objective in watershed management will be to maintain the water quality in the Red Deer River at or above provincial standards.

The relevant portion of the map is reproduced below. Again, the approximate location of the lot is circled in red. Access the full online map [here](https://rdrwa.ca/mapping-hydrologically-significant-areas/) (https://rdrwa.ca/mapping-hydrologically-significant-areas/).



The darker the area on the map, the greater its hydrological significance. The key to the right of the map indicates that two areas on this lot are in the highest rating, meaning they are “punching above their weight” (RDRWA “New”) as far as working to protect water quality in the Red Deer River watershed. More than surrounding areas, they contribute to a resilient landscape that naturally distributes rainwater, protecting the area from both drought and flood. As climate change occurs and rain events become both heavier and further apart, areas such as these within the city will only become more vital.

The Geotechnical Report supplied by the developer supports the findings of the RDRWA and NCC by indicating the presence of water in the gravel, silt, and upper bedrock layers in test holes around the site. The Vegetation Assessment supplied by the developer also states that “The potential development will result in a change of stormwater management. Based on the borehole drilling report There is a gravel layer underlying the development area.”

Please see attached the RDRWA’s 2022 submission to the proposed rezoning of this lot as it reinforces our reading of their and the Nature Conservancy of Canada’s work and outlines the importance of the area to the Red Deer River and to the already endangered health of the Waskasoo Creek watershed.

Policy 9.7 of the *MDP* states: “The City should incorporate significant natural features as part of the overall infrastructure systems.” This lot contains two, and the proposed development sited along the south end of the lot will destroy the one to the south. Again,

which 26% of the lot is covered becomes vital. A development that fits the Character Statement, carefully located further north and on the east side of the lot can continue to accommodate and protect these natural storm water management systems that both slow erosion and recharge, store, and redistribute ground water.

II. ECOLOGY

As well as impacting the watershed, a large multi-family structure located along the south side of the lot along 59th Street will also harm the area's ecology and fragment wildlife habitats in the Red Deer River Valley. Small mammals, songbirds, herptiles, invertebrates, and ungulates rely on the continuity of the riparian vegetation strip to functionally link the larger systems of Waskasoo and Piper Creeks, and Fort Normandeau to the south and west, with the Gaetz Lakes Sanctuary, Mackenzie Lakes, Three Mile Bend, and the Riverbend Golf and Ski Area to the north and east. Linked corridors provide a conduit for gene flow southwest to northeast across Red Deer for a diverse range of flora and fauna and are essential to an ecologically functional park system.

45th Avenue and the strip of land around it in this location is a designated wildlife corridor in the Gaetz Lakes Sanctuary Committee Management Plan (See GLSC submission) and functions as such for wildlife travelling both along the south riverbank (right side) and between the Gaetz Lakes and the river. As the park map and images below demonstrate, the thin and slumping remnant of the riparian zone and corridor is already dangerously narrow in terms of habitat values and the strip next to this lot is a tenuous link that has been relying on the Open Space – Major character of the schoolyard to function.



Site within the connected park and trail system. Green areas indicate protected park and environmental reserve areas.



Image from north end of property looking south along 45th Ave and the Red Deer River. Note the slump, the curve of the river, and the narrow riparian strip. Photo by Chris Olsen.

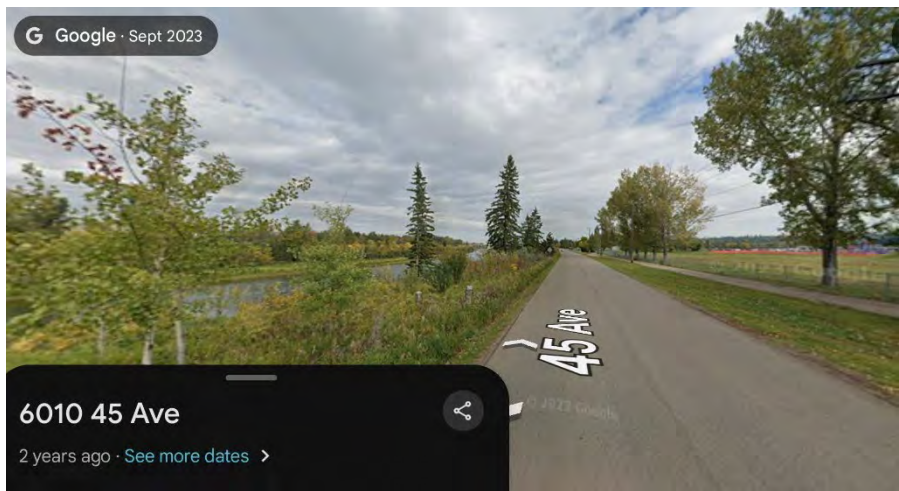


Image of 45th Ave along 4240 59 St. looking north. Note narrow riparian width, impinged wildlife corridor, as well as lack of curbs, sidewalks, and street lighting.



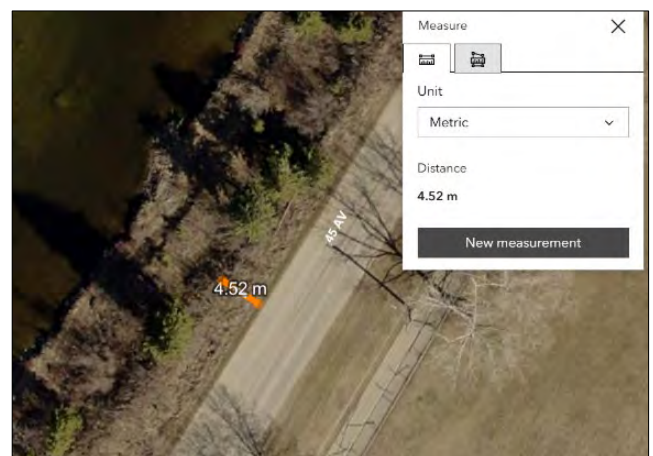
Image of 45th Ave pull out and trail overlook.

As the Gaetz Lakes Sanctuary Committee asserts, “many of the wildlife species that presently move through this vital habitat linkage, especially the small ones that comprise the bulk biomass of biodiversity, are already at great risk” (See GLSMA submission). An apartment building located along the south end of this lot, with its associated paved parking, fencing, disturbance of the natural road boundary, paved access road, and increased human activity will impact this corridor even further and force wildlife onto the road becoming a danger to themselves and to traffic. We note that even the Wildlife Assessment for the development permit application states, “certain types of development could impact wildlife movement,” and in the riparian zone “wildlife can experience indirect impacts such as sensory disturbance, depending on the development plan.”

III. BANK STABILITY

In this location, both hydrology and ecology are connected to bank stability. The property is on an outside curve of the river and that curve is an active erosion zone. Healthy rivers move across their landscapes. The historical movement of the Red Deer River is evidenced by the oxbow Gaetz Lakes that it created nearby, and the river’s current movement along this stretch is evidenced by slumping and bank scour. It is also shown by the fact that the river access stairs installed at 45th Ave and 59th St in 2004 were washed out numerous times and, even after their foot was protected with armouring, were removed completely in August, 2025.

In 2018, a 1 km stretch of the riverbank north of 59th St underwent a slope stability study by ParklandGEO for the City of Red Deer. The report states that adjacent to 59th Street where the river curves north there is evidence of both “toe scour along the shoreline” (8.1) and “bank scour and damage related to the 2005 flood” (8.6). It also states that the area is prone to landslides related to flood events and these are expected to be similar to historic slides located to the north which are 15m wide and reach 8m inland from the bank’s crest (8.6). The stability report concludes that “the potential is considered to be high for a localized slide after periods of flooding” (8.8).

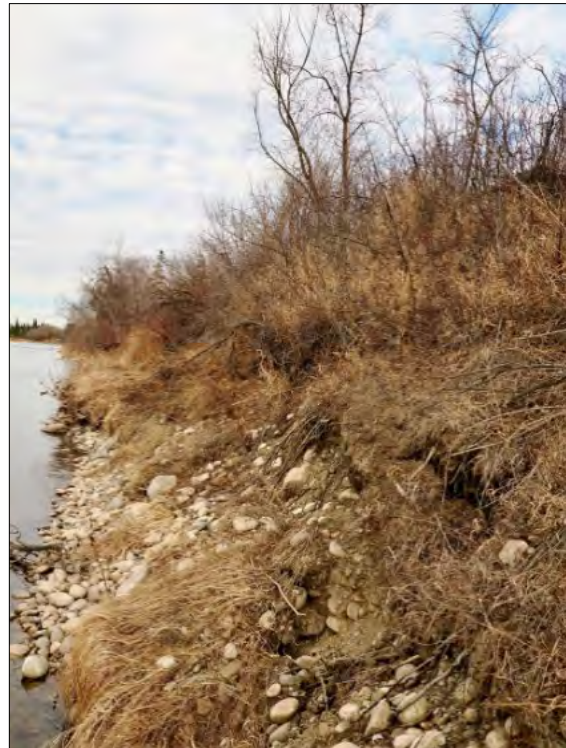


Let us be clear: none of this is likely going to impact the proposed building. However, it will impact 45th Avenue. The bank stability report

describes 45th Avenue as a 7 to 8 m wide asphalt road (s. 8.6) laid on sand or native sand (s. 8.5) and “separated by a small strip of natural area along the crest” of the riverbank (s. 8.1). According to the city’s interactive web map, across from where the development’s access road meets 45th Ave, that strip is approximately 4.5 m wide and in some areas the strip is as narrow as 4 m. A landslide 8 m deep and 15 m wide along this stretch will wash out 45th Ave. Because of this threat, both the South Bank Trail through Waskasoo as well as 45th Ave past 59th Street were closed during the 2005 and 2014 floods.

Additional traffic on this stretch of 45th Ave, combined with additional stormwater runoff either from the development or from the stormwater outflow near the lookout, will impact bank stability. Further, climate change is resulting in more severe weather and extreme precipitation. For this reason, the City’s 2024 *Climate Adaptation Strategy* elevated the likelihood of a 1 in 100-year flood with a peak discharge rate of 1870 m³/sec from a historic rank of “Unlikely,” or once every 51-100 years, to a future rank of “Possible,” or once every 11-50 years. The 2005 flood peaked at 1710 m³/sec and although the 2014 flood peaked lower than that, it was forecast by Provincial officials to reach a peak flow rate of between 2000 and 2300 m³/sec (“Red Deer Expects”).

2022: Images of current bank instability



Images of slumping and collapse along the river and 45th Avenue. Photos by Chris Olsen, 2022.

2005: Images of landslide beneath 59th St. and 45th Ave. lookout after the flood



Image of washout at 59th St and 45th Ave after the 2005 flood. Screenshot from ParklandGEO bank stability report, 2018.

PHOTOGRAPH 35 (2005): EAST RIVER BANK AND WASHED OUT ACCESS TO RIVER AT THE SOUTH END OF THE STUDY AREA, FACING SOUTHEAST (AFTER FLOOD)



Images looking down at the landslide at 45th Ave and 59 St. after the 2005 flood. Indications of slumping and damage can be seen within feet of the trail lookout's guardrail. Photos taken by Brenda Garrett.



At some point, the City will have to relocate all or portions of 45th Avenue and the South Bank Trail into the Municipal Reserve to the east which will even further impinge on an already dangerously narrowed wildlife corridor. Any reinforcement of the escarpment to stop erosion and protect private property will remove the native vegetation along the riverbank, destroying the riparian zone that keeps the river and surrounding natural area alive and healthy, and cost city taxpayers millions of dollars.

THE TEST

We understand that the SDAB can approve a development permit that does not comply with the bylaws if it believes the development will not unduly interfere with neighbourhood amenities OR materially interfere and affect the use, value and enjoyment of neighbouring properties (Bylaw s.2.100.1.8). The following sections demonstrate how this proposed development will do both.

I. VALUE, USE AND ENJOYMENT

The development will deeply impact the value as well as the use and enjoyment multiple private properties. While real estate valuation is extremely complex, in this case, there is substantial academic research that demonstrates views increase property value. In a 2022 literature review published in *Frontiers in Public Health*, Chen *et al* summarize thirty years of research on the impact of urban green spaces on housing prices (Chen). The review uses the term “parkland” to refer to the general subject of these studies which includes not only parks but also open area, recreational spaces, landscapes, green spaces, green areas, green corridors, greenbelts, vegetation, greenery, urban forest, environmental amenities, coastline, water features, and riparian corridors.

The review finds that decades of research from around the world and using multiple scientific methodologies has shown that proximity to open and green spaces increases property values with adjoining and abutting properties seeing the greatest increase because of proximity, comfort value, and views. This is true to varying degrees for all types of open spaces from private to publicly owned; forest, to ocean, to grassland; preserved or developable; from large national parks to trail networks. It is also true for all types of dwellings from single family homes to rental apartments. Thus, the City of Calgary uses criteria such as “parcels separated from the ... River by a green space” and “properties that have a largely unobstructed view of the ... river valley” when assessing property values (City of Calgary).

As shown in the viewshed analyses on page 9 above, the development’s size and location on the lot will completely obstruct longstanding views of the river escarpment to the northwest, the Pines Hill to the north, the forest on the rise of the Red Deer River valley

escarpment to the northeast, and the rural open space uncommon in other areas of the city. This loss of views will reduce property values of area homes primarily impacting those adjacent to the open space along 59th Street. To varying degrees, it will also impact homes along 44th Ave where the view is framed to the north and homes on 45th Ave looking east and northeast near the intersection with 59th St. This reduction in value is material and proven. The impact on property values is even more appalling since some homeowners here have made considerable investments to enhance their access to those views including installing larger windows, building elaborate decks, and even turning their homes so they face the view.

Again, *we recognize that 4240 59 St is not a city park*. It is privately owned and developable. However, the ARP and Environmental Character Statement are constructed in such a way as to make development possible while preserving the value, use and enjoyment of pre-existing properties and neighbourhood amenities as much as possible. Once again, which 26% of the lot is covered by development is key.

The proposed development also impacts area housing values by exacerbating area traffic (see below) and by siting the apartment building to face north, cutting off any sense of connection between it and the neighbourhood to the south. Not only will Waskasoo residents lose their views, but they will also be forced to look at the building's unremarkable rear and service door. While not the direct subject of the literature review discussed above, the studies referenced also indicate that increases in traffic and parking congestion and urban streetscapes such as the one which would be created by the proposed building decrease property value. That streetscapes impact property values is again supported by the City of Calgary using the criteria of "parcels beside parcels developed at an increased density from the geographic norm – typically low- or high-rise residential structures" when assessing value (City of Calgary).

At the same time as reducing nearby real estate values, the development will unduly impact the use and enjoyment of nearby properties through overlook and significantly reduced privacy. The apartment building will have direct views of area homes and yards from 24 balconies and 85 windows and indirect (peak-a-boo) views from 18 decks and 48 windows. Because of the neighbourhood's layout with the residential avenues intersecting 59th St and the homes on those avenues sited east-west, the sightlines from those decks and windows will not only be into front windows and living rooms but also into side windows and bedrooms and bathrooms. Most of these dwellings are small (under 900 ft²) meaning there are few indoor areas to move to for privacy. The development's 42 decks and 133 windows will also have sightlines into numerous front and rear yards particularly along 59th but also front yards along 44th and 45th Avenues and rear yards down the lanes.

Nor does the architectural design offer any attempt to protect neighbours' privacy with careful window placement, physical screening, and/or directing decks away from the pre-existing homes in the neighbourhood. At the MPC hearing, proponents for the development argued that the overlook was inconsequential because the building would be "half a football field away." We note that people pay a substantial amount of money to watch football games from half a field away and even follow the game a full field away from endzone to endzone.

Further, because it is located too close to the street, the development requires the removal of the four largest trees that would supply screening. It is also worth noting that ALL the mature trees along 59th St. are deciduous and offer little to block sightlines for 7 to 8 months of the year.



Image of north side of 59 St in winter. Trees behind the fence are proposed to be removed. Also note the "No Parking" signs along the road.

Below is a panorama looking north from the crosswalk at 44th Ave and 59th Street, directly across from the proposed development. Note the complete lack of screening by the trees as well as panoramic view of the river escarpment on left, Pines Hill in middle, and the forested slope of the Red Deer River valley the right.



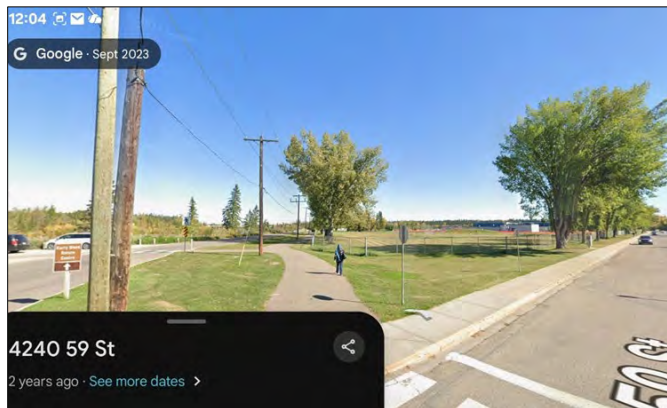
This is not a case of buyer beware. These homes have had those views and their privacy protected by Open Space – Major, PS land uses for over 75 years. Further, when the County School Division subdivided the former schoolyard, and this site was threatened by potential overdevelopment, homeowners' views and privacy were again protected by Council when they passed the Area Redevelopment Plan and Environmental Character Statements in 2016, four years before East Lincoln Properties purchased this lot.

II. AMENITIES OF THE NEIGHBOURHOOD

The development will unduly interfere with the amenities of the neighbourhood. Many of the character statement recommendations exist to preserve neighbourhood amenities, so we will try not to be overly repetitive here.

A. VIEWS & VISTAS

Views are shared amenities, and we have shown that this application will obstruct longstanding views and vistas from 59th Street and 44th Avenue. Its location will also obstruct views to the east across the front of Gateway School from the South Bank Trail and the rural access road to the park system.



View to the northeast from the crosswalk at corner of 45th and 59th indicating trail and park access road vistas.

B. TRAILS

The development's access road will add a significant hazard to a very busy portion of the South Bank Trail, one of two main trails through Red Deer's Waskasoo Park (the other being the North Bank Trail). Proponents state that much of this traffic would be outside the time the trail is in use (MPC Report 93) but offer no evidence of how this was determined. As stated in the letter from the Waskasoo Environmental Education Society, operators of the major park nodes along the trail system, this section of trail is "extremely well-used" by recreational users, commuters, and school children. The trail is busy at all hours.

We can't find an example of another access road that has been built across the South Bank Trail since the trail system's inception in the 1980s. The access to Parkland CLASS/Gateway School parking to the north and the driveways along Cronquist Dr. in West Park cross the trail, but these were pre-existing land use patterns when the trail was built. In fact, the Neighbourhood Planning and Design Standards state that developers should "Restrict driveways from crossing the multi-use trail along the collector by locating housing types with restricted front drive access" (s. 3.7). It seems that if the design standards are concerned about driveways from single family homes crossing the trail system, best practice would be to NOT add a driveway from a multifamily building, particularly when there are other ways to access the site.

C. AREA ENVIRONMENT

The public lands, South Bank Trail, Red Deer River, and Gaetz Lakes Sanctuary abutting and adjacent to this development as well as the wildlife that uses them are amenities to the neighbourhood and the entire city. Because of all the environmental reasons outlined above as well as in the submissions from the Waskasoo Environmental Education Society, Gaetz Lakes Sanctuary Committee, the Red Deer River Naturalists, and others, it is apparent that this development will impact the use and enjoyment of the shared public lands surrounding this property.

D. SAFETY

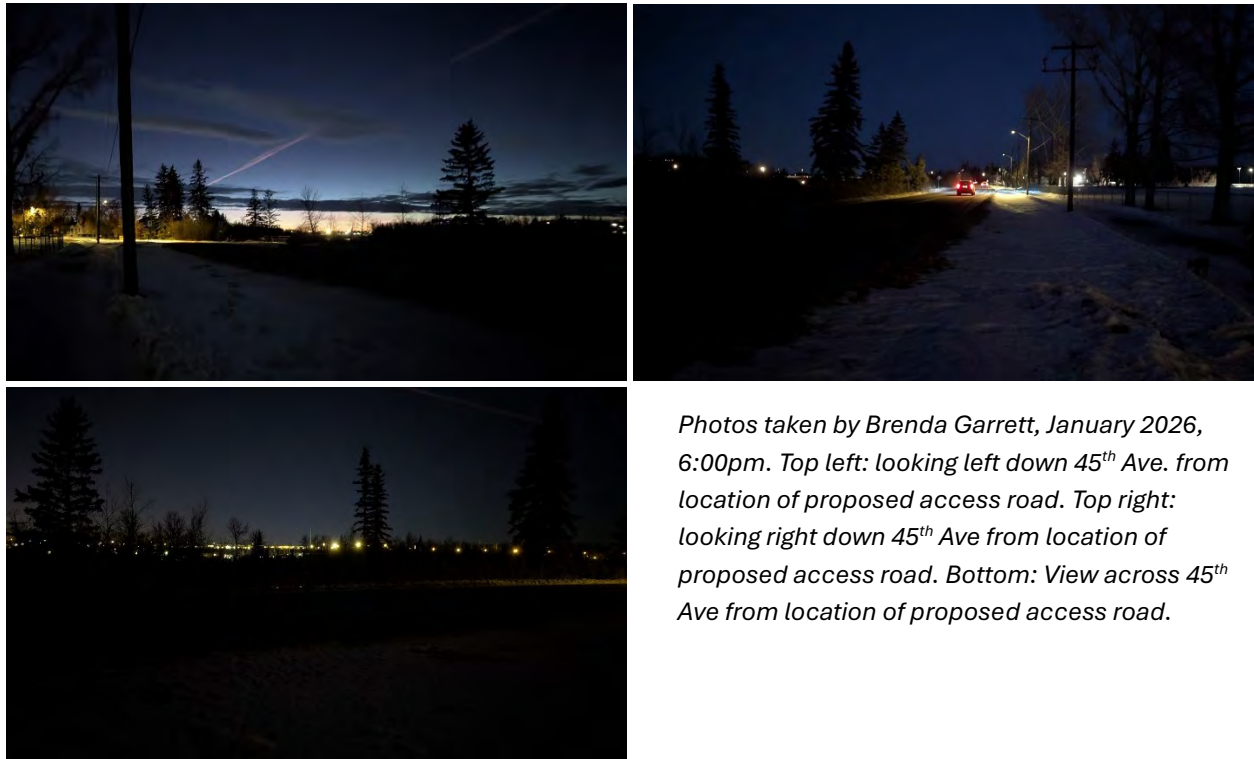
Waskasoo's streets are subject to burst traffic, parking congestion, and daily traffic back-ups (see following section) which impact emergency response times and pedestrian safety. Emergency response vehicles will be challenged to get to accidents and fires at the back of the neighbourhood during peak times. While it is an emergency service's responsibility to arrive at a scene as fast as possible – even, if necessary, pushing vehicles out of the way or driving through yards and fences to get there – it is also a planning responsibility to reduce the likelihood that these sorts of actions need to be taken. Further, it is during these peak traffic times that an emergency is statistically the most likely to occur.

Traffic issues also impact pedestrian safety, many of whom are local children walking to our three schools at the same time as the burst traffic is occurring. The threats to student safety is verified by the responses submitted by Camille J. Lerouge School, the Red Deer Public School Board, and numerous parents who live in Waskasoo as well as other areas of the city.

In discussing both traffic and pedestrian safety, proponents outline in the MPC Report that “An assisted living facility will have little if any pedestrians” and that “traffic during peak periods” will “predominantly be facility staff going to and leaving work” (p. 92). First of all, the only facility staff is an onsite manager because, second, this apartment building is emphatically NOT an assisted living facility. Renters here will not receive meals, health monitoring, room cleaning, or any other in-house assistance services.

Instead, this development is a 55+ multifamily apartment building and, according to the materials submitted for previous iterations and applications, will be marketed to active independent seniors who want easy access to area trails and parks. All the tenants will need to either go get goods and services or will have to have goods and services delivered. Some will also still be working, and many will be involved in multiple city-wide activities. All of this will add to already critical traffic and pedestrian safety issues. Finally, proponents have oddly focused the discussion of pedestrian safety solely on the potential residents and ignore the impacts of additional traffic on the safety of school children.

Concerning the building's residents, we also question the safety of locating the access for a high-density, multifamily building on a road with intentionally few street lights; no lines, curbs, or guardrails; that is also a wildlife corridor; and runs alongside a riverbank.



Photos taken by Brenda Garrett, January 2026, 6:00pm. Top left: looking left down 45th Ave. from location of proposed access road. Top right: looking right down 45th Ave from location of proposed access road. Bottom: View across 45th Ave from location of proposed access road.

E. TRAFFIC AND PARKING

This development will also add to verifiable traffic issues in Waskasoo. These issues have been acknowledged by a former Engineering Services Manager, past City Managers and City Councils, area schools, and school boards. They are also verified in the responses submitted to this application by the Principal of Camille J. Lerouge, by the Red Deer Public School Board, and by parents from the local schools.

These traffic issues exist because Waskasoo was not designed according to today's best planning practices. Designed 125 years ago, the neighbourhood has narrow roads and limited access points all of which are from 55th St in the south. (See Map below) Compounding this, a number of high-traffic uses have been added over the years and most are located at the back of the neighbourhood: Lindsay Thurber Comprehensive High School, Camille J. Lerouge Middle School, Gateway Christian K-12 School, Parkland Community Living and Support Services, Memorial Centre, Festival Hall, Kerry Wood

Nature Centre, Gaetz Lakes Bird Sanctuary, McKenzie Trails Recreation Area, and the City of Red Deer nursery and storage yards.

With the transfer of the Riverglen county school building to Gateway Christian School in 2015, traffic in Waskasoo increased exponentially. A county school with 188 students arriving mostly by bus is now a destination Red Deer Public School with over 800 students arriving primarily in family cars. Combined with the two other secondary schools, Waskasoo is now visited daily by over 3500 students and staff.

Altogether, this means that a 2022 traffic count (shown on the following page) found there are 2627 vehicle trips on 45th Avenue daily. A pre-pandemic count done in June 2016 indicated 3600 daily trips.

45th Avenue south of 59th St was not designed for this amount of traffic. At 10.7 m wide, it most closely resembles the City's *Engineering Design Guidelines*' 11 m Multifamily Undivided Local Roadway classification. According to the *Design Guidelines*' Roadway Geometric Design Elements, an 11 m local road is rated for a typical traffic volume of under 1000 trips/day (s. 14 Appendix A). This means that according to its design, even the widest portion of 45th Avenue is already 250-350% over what should be its typical traffic volume according to best practice. And it is 0.3 m narrower than the standard 11m road.



Proponents of the development state that because 45th Avenue functions as a collector road, meaning it carries traffic between local and arterial roads, it can handle up to 8000 vehicles per day. However, also according to the *Design Guidelines*, to handle that volume of traffic collector roads should be 12 m wide (*Engineering Design Guidelines* 4.5.C.3). This means 45th Ave is 1.3 m narrower than the best practice for a collector road, resulting in vehicle travel lanes being reduced from a collector's standard 3.5 m to 2.85 m (and even less when wide vehicles are parked along or cars are parked away from the curb). This reduced width is dangerous and creates traffic jams. We also note that 45th Ave also functions as the collector road for Woodlea where it narrows to approximately 9 m. See image to the left. By this logic, this narrow road should also safely handle 8000 vehicles per day.

2022 Traffic Count overlayed onto map of the east portion of the Waskasoo neighbourhood



Compounding the amount of traffic is the fact that much of it is “burst traffic,” meaning it happens over short periods. At these times, when school starts and ends or there are large cultural or sporting events, frustrated drivers are more likely to take risks such as running lights and stop signs, speeding down alleys, passing unsafely, blocking roads and driveways, and pulling out in traffic. Further, because this is primarily destination and not residential traffic, it will increase as the city grows, local schools expand, and more people access the parks.

Engineering has also said that one of their key metrics for traffic is how long it takes for vehicles to move through the lights at 45th Avenue and 55th Street. Signalized intersections in Red Deer are considered failures if it takes vehicles longer than two minutes to move through the intersection. While traffic on 45th Avenue may be able to make it through the 55th Street intersection in that time, those vehicles have already been waiting significantly longer than that to make it west from the schools down 58th and 59th Streets and onto 45th Avenue.

Below are screenshots from a 2022 video of traffic exiting the neighbourhood after the school day. Traffic is travelling west along 58th St. past the Waskasoo Playground and waiting to turn south onto 45th Avenue to get in line for the signalized intersection at 55th St.



Screenshots from 58th St and 44 Ave corner. Left image: looking west down 58th St towards the yield on 45th Ave. Right image: looking east down 58th St towards Lindsay Thurber Comprehensive High School.

Please go to the WCA webpage at <https://www.waskasoo.com/blank> to watch the videos. If you watch the bright red SUV that pulls up under the Canada flag at the end of video 1 and is the subject of video 2, you will see that vehicle has waited at least 3 minutes to just reach the yield sign at the west end of 58th St where it can turn onto 45th Ave to get in line for the light on 55th St.

One of the *MDP*’s guiding principles is to “effectively manage ... intensification/infill and increased traffic through sound planning practices and consultation with citizens” (s. 3.2.2). And the intent of Principle 3 in the NPDS is that “Traffic and parking are reduced and do not dominate the neighbourhood” (p 31). Waskasoo is already dominated by traffic and parking and this development will of necessity be autocentric. The immediate area has few

services, and the nearest grocery store is a 30-minute walk one way (Superstore). As well, transit runs on 55th St which means this development is further from bus service than the recommended 400 m (NPDS s. 2.8), and as long as critical traffic issues remain in Waskasoo, it would be exceedingly difficult to bring public transit through the neighbourhood at peak times. Taken together, this means that renters will likely either drive for work, volunteer, and other city-wide activities if they are independent or have groceries, other necessities, and services delivered, including multiple daily trips by homecare aides, if they are not independent.

Former Engineering Services Manager, Konrad Dunabar, wrote in a Sep 3, 2021, email that City Engineering “did confirm that 45 ave is narrow for a collector and with the parking and intersection configuration is not likely performing well.” He also explained that “If changes are required to the length of 45 ave this could be a difficult and costly proposal” and that the City had “identified changes to 42 A ave that although costly would likely improve the situation greatly. However due to the cost and lack of current budget these solutions won’t help the immediate problem.” Approving this discretionary use will add to these traffic and safety issues and contribute to the need for costly changes to area roads to move traffic effectively.

Even as early as 1967, the then City Manager recognized the potential for traffic issues if multifamily housing were to be built at the back of the neighbourhood. In a report on whether City Commissioners should approve an application to rezone land adjacent to the Kerry Wood Nature Centre for multifamily apartments, he wrote: “An examination of this general area related to the Future Residential Land Use pattern proposed for the next 20 years or for a population of 50,000 for the City of Red Deer” revealed that “45th Avenue was not designated or constructed as a major road. Therefore, any major residential expansion on the Glenmere Farms holdings could well cause traffic problems along 45th Avenue” and that “the possibility of developing convenient and direct alternative major roads to disperse the traffic, does not exist in this area because of the present land use and land ownership patterns” (*Red Deer Regional Planning Commission*). Now Red Deer has a population of 112,000 and traffic has indeed become an issue.

As might be expected, this traffic leads to parking issues, particularly in the area surrounding 4240 59 St. Here, there is no offsite parking along 45th Ave. because it is narrow and has no curbs or sidewalks; limited offsite parking along the north side of 59th St because of the Canada Post mailboxes and school bus staging area for Gateway School; and limited parking on the south side of 59th St. because of driveways, lanes, and streets.

A seventy-year-old county school, Gateway was never designed to handle so many vehicles efficiently, so the school’s parking also regularly backs up onto 45th, 44th and 43rd

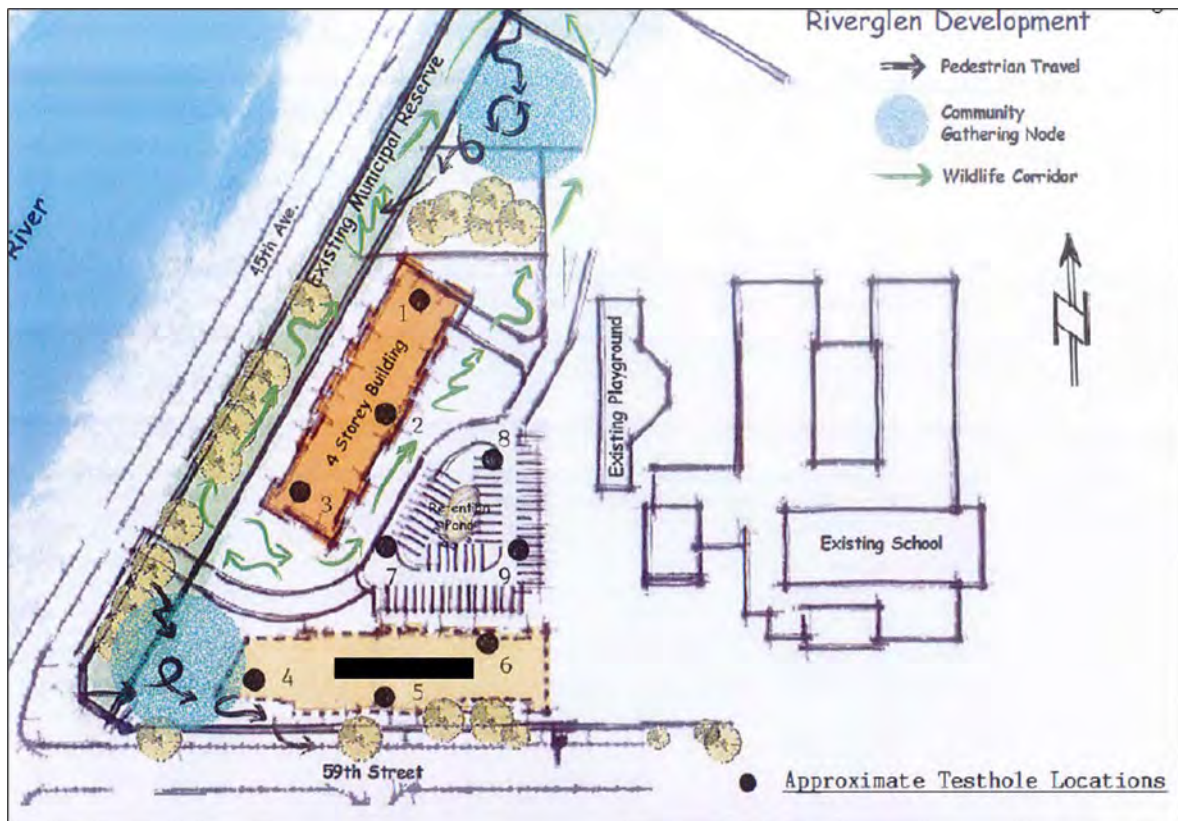
Avenues as well as Waskasoo and Moore Crescents, and frustrated drivers inevitably park in front of crosswalks, alleyways, driveways, hydrants, and even along the river escarpment. This illegal parking damages the environment, hinders local traffic movements, and, most importantly, creates significant safety hazards.

Proponents for the development point out the building requires only 19 parking stalls and proposes 59 – although the plans indicate 52. Either way, we are concerned. If the development is meant to be truly supportive living which requires 0.4 parking stalls per unit (Zoning Bylaw, p. 118), why would East Lincoln Properties pay for 300% more parking, and why should a key environmental area be covered with 300% more asphalt than necessary? The excessive parking leads us to believe that, at best, the developer expects this to be an autocentric building with considerably more traffic than is being predicted.

For all the reasons outlined above, the development stands to negatively impact the amenities of the neighbourhood. This impact can be described as “unduly” because the development could be designed, sized, and sited differently, because the application is for a discretionary use, and because there are other uses allowed on this lot in the PS zone.

INDICATIONS OF PLANS FOR SECOND BUILDING

If, at best, the extra parking indicates the development is expected to generate considerably more traffic than is being proposed, at worst, it signals the intention to build the two building, 120+ unit apartment complex the developer has wanted since the pre-development meeting in 2022. There are other indications that this is the case. First, while the parking lot has a different layout, it is for almost the same number of vehicles as the lot proposed for the two-phase complex in 2023, which had 55 stalls. Second, the proposed building’s bizarre siting on the lot with its rear to the neighbourhood and all the open space to the north has no solid planning reason other than to reserve space for a phase 2 building along 45th Ave. Because it covers only 26% of the site, there are many better building locations available, particularly (as we have repeatedly said) to the north and east side of the parcel. Third, the Smith-Dow Geotechnical Report is dated months after the developer’s application to rezone was refused by Council yet still describes the development as “a three-storey apartment condominium” located “along the south portion of the site by 59 Street” and “a four-storey structure with an underground parkade to the west along 45 Ave.” Test holes for the second building and its underground parking garage were also completed and the report included the map below indicating the layout of the apartment complex and the location of the test holes.



If what is indicated in the map of testhole locations is the full intention for the site, the argument that the development “demonstrates a clear commitment to the Waskasoo Environmental Character Area” because it “limits building coverage to just 26% of the parcel” (MPC Report 3) or that “the remaining open space will continue to contribute to the existing open space and will continue to act as an amenity to wildlife” (MPC Report 8) is misleading and manipulative at best.

CONCLUSION

East Lincoln Properties is a very experienced, highly qualified local developer who purchased the lot with the Area Redevelopment Plan in place and in full knowledge of the limitations on this property. They were directly informed by a WCA past president in 2019 that development here was subject to the Environmental Character Statement and should be small and located on the north-east portion of the parcel. In 2020, they purchased the 4+ acre lot for \$800,000 anyway and have since attempted numerous times to get permission to build the same multi-family development, or portions thereof, but have been:

- told by numerous City department managers and officers that the development does not fit the ARP in a 2022 Pre-Development Meeting
- discouraged by stakeholders from applying to remove the site from its character area to make way for this development in 2022
- refused by City Council in 2023 when they applied to rezone the site to high-density residential and amend the Area Redevelopment Plan to fit their development.
- refused by the Municipal Planning Commission in 2025 when they applied for a development permit to build their development as a Senior Supportive Living Accommodation.

We humbly request that the SDAB uphold these past decisions and once again refuse this application for a discretionary use on this parcel. We have shown above that it:

1. Does not meet 4 of the 5 Waskasoo Area Redevelopment Plan Objectives.
2. Does not meet 10 of the 17 applicable Character Statement regulations that form part of the Zoning Bylaw and prevail over the Bylaws in the case of conflict.
3. Does not fit the intent of the Public Service Zone.
4. Does not fit the definition for the Supportive Living Accommodation Use.
5. Does not align with the Municipal Development Plan's Generalized Land Use Map and Policies.
6. Will damage the environment.
7. Will materially interfere and affect the value, use and enjoyment of neighbouring properties.
8. Will unduly interfere with neighbourhood and city-wide amenities.

The WCA Board understands that East Lincoln Property owns the land and has the right to develop it. However, that right is not absolute, and any development must fit within the Zoning Bylaws and policies, most critically the Waskasoo Area Redevelopment Plan and Environmental Character Statement (see appendix attached.) We note that most land in the city is privately owned and developable, yet most development occurs within the constraints of City Bylaws and Plans.

In past submissions and presentations, we have shown that there are ways to develop this lot within the hierarchy of regulations and policies. These include public and quasi-public permitted uses such as an outdoor recreation facility and discretionary uses such as a small, low-impact cultural facility (e.g. the Red Deer Archives) or church, perhaps even the Indigenous Cultural Centre that is looking for a home. We have also stated at the 2019 meeting with the developer, at the 2023 public hearing, at the 2025 MPC hearing, and here that even a supportive living or temporary care facility could work if it were conservatively sized, sited along the east property line, and set back 30m from 59th Street. Examples of

these types of supportive buildings include the Red Deer Hospice and Harmony Care developments in both Gasoline Alley and Inglewood. See below.



That ours is not a NIMBY response is demonstrated by comments from John Bouw, our Vice President, to the Red Deer Advocate after the 2025 MPC hearing: “... we do realize that development will occur at some point and I think we can still work with East Lincoln on some plan to make it work, I really do” and that the association would be happy to work with the developers on coming up with a design more palatable to residents (Cowley).

It is also demonstrated in the letters submitted for the MPC hearing and in the Public Consultation Summary of the MPC Report that states there were “several letters explicitly requested deferral of the application until additional consultation occurs” (p. 94). City Administration’s response was that “a formal public engagement process ... is not a requirement” and “The Development Authority would not require any applicant to defer their application to carry out public consultation” (MPC Report 95).

However, Section 2.40 of the Zoning Bylaw outlines regulations for Development Permit Applications and states, “Prior to an application being considered, the Development Authority may require the applicant to host a public meeting to ensure information and an opportunity to comment about the application is provided to the public at large” (s. 2.40.10). After which, “the applicant must provide to the Development Authority a Report summarizing the nature of the consultation process and the responses received, identifying any issues raised and discuss how the applicant proposes to address these issues (s. 2.40.10. 2).

Knowing the history of this site and its importance not only to Waskasoo but to the entire city, this would seem to be the ultimate time to require such a meeting. Perhaps if this had been done, we would not all have been mired in the red tape and taxpayer expense of a six-hour MPC hearing and now an SDAB hearing.

Further, if proponents believe community consultation has been completed because this version of the application is essentially the same as what was consulted on in 2022, then it is clear that the 120+ unit two-building apartment complex that was consulted on then is still intended now, and we urge the SDAB to look at the summaries of the consultation and the community's response to that/this development.

To be clear, we request that the SDAB uphold MPCs refusal of this application because it does not meet requirements of the character statements, bylaws, and policies; it will harm the environment; and will impact neighbouring properties and neighbourhood amenities. As Mayor Johnston said in 2023, refusing this development permit still allows for development, still allows for owner rights, and still allows for consultation and comment (City Council Special Meeting Video, 4h11m).

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APPENDIX

Below, please find:

1. Letters of Opposition to this development permit application from organizations connected to properties in Waskasoo.
2. The Waskasoo Area Redevelopment Plan including the Character Statements.



ÉCOLE CAMILLE
J. LEROUGE SCHOOL

November 6, 2025

RE: Opposition to Development Permit Application – 4240 59 Street (Waskasoo Area)

To Whom It May Concern,

I am writing on behalf of the École Camille J. Lerouge School community regarding the current development permit application for 4240 59 Street, located between Gateway Christian School and the Red Deer River. As the principal of École Camille J. Lerouge since 2019, I represent a school of approximately 650 students in Kindergarten through Grade 9, located at 5530 42A Avenue. Our students come from across Red Deer and surrounding communities, including Blackfalds and Innisfail.

Our school community remains strongly opposed to this proposed redevelopment. We share the concerns of the Waskasoo Community Association regarding the significant impact this project would have on traffic congestion, parking, and pedestrian safety in an already overburdened area.

The proposed development site lies within a three-block radius of three major schools—École Camille J. Lerouge, Gateway Christian School, and Lindsay Thurber Comprehensive High School—which together serve more than 2,600 students daily. Traffic congestion during morning drop-off and afternoon pick-up times is already severe, with vehicles often backed up through multiple intersections. According to City standards, 45 Avenue is already operating at approximately 250–260% of its intended capacity. Adding even a single multi-unit residential building—let alone two—would exacerbate this situation considerably.

Of particular concern is the lack of adequate pedestrian infrastructure and safe student crossings. There is no sidewalk on the south side of 59 Street, and school buses for Gateway Christian School occupy the north side during peak hours. This leaves little

to no safe passage for students walking or biking to school. Increased vehicle volume from additional residential density would compound these risks for all students in the area.

Our school has worked closely with the RCMP and the City of Red Deer Bylaw Services over the past several years to mitigate speeding, illegal parking, and unsafe driving behaviors in the area surrounding our campus. Despite these efforts, conditions remain challenging and unsafe. Approving this development would undermine the progress made toward improving safety for our students and families.

We respectfully urge the Municipal Planning Commission to consider the significant and measurable safety and traffic concerns associated with this proposal. The cumulative impact on the Waskasoo school corridor cannot be overstated. Our community's priority must remain the protection and safety of children, staff, and families who use these streets daily.

For these reasons, École Camille J. Lerouge School does not support the proposed development at 4240 59 Street.

Thank you for your attention to this matter and for allowing our school community to provide input on an issue that so directly affects the safety and well-being of Red Deer's children.



Principal

November 5, 2025

Jay Hallet
Senior Development Officer
City of Red Deer % Inspections and Licensing Department
4914 48 Ave
Red Deer, Alberta
T4N 3T4

*Re: Proposed Zoning Changes and Development Permit Application East Lincoln Properties –
4240 59 Street*

To Whom it May Concern,

The Gaetz Lakes Sanctuary Committee reports to Red Deer City Council and is charged with the protection of the Gaetz Lakes Sanctuary. The Committee's creation was a condition of the agreement that saw the Province of Alberta transfer the Sanctuary to City ownership in the 1980s. The Committee has Statutory authority over the Sanctuary. They are responsible for the implementation of the Gaetz Lakes Sanctuary Management Plan and provide guidance and direction to The City and to the Waskasoo Environmental Education Society.

While not directly notified of the application for a Development Permit by East Lincoln Properties for the lot at 4240 59 St, The Committee has an interest in commenting on the impacts of the development as they relate to the environmental health of the Sanctuary, and to the wider environment.

We echo the concerns shared by the Waskasoo Environmental Education Society, the Waskasoo Community Association (WCA), the Red Deer River Naturalists (RDRN), Camille J. LeRouge school, and other concerned citizens and groups. We thank the WCA for bringing this matter to our attention.

The Gaetz Lakes Sanctuary Management Plan (GLSMP)

The GLSMP was adopted in principle by Red Deer City Council October 7, 1997. This plan governs the activities in the Sanctuary and specifies how development around the Sanctuary should be done with minimal impact. The GLSMP is the instrument through which the Gaetz Lakes Sanctuary Committee directs WEES and provides input and guidance to The City of Red Deer.

45th Avenue is designated in the GLSMP as one of the three wildlife corridors - along with 67th Street and Cemetery Hill - supporting the Sanctuary that should be protected.

"Wildlife corridors are believed to reduce mortality and habitat fragmentation for animals in areas of human development (Foster and Humphrey, 1995). The protection of wildlife corridors is critical for the long term utilization of the Sanctuary by ungulates and other animals. Without a means of entering and exiting the Sanctuary freely, wildlife populations may abandon the area in order to find more accessible places to reside"

Recommendations in the plan include the statements (both GLSMP, page 19):

- "Protect habitat along 45th Avenue", and
- "Reforest/protect wildlife corridors at strategic locations"

Specifically "... a developer is required to protect existing wildlife corridors on designated lands" (GLSMP, Page 20). While this statement is specifically referring to the Michener Centre Outline Plan, the accompanying figure (Figure 1. Wildlife Corridors of the Sanctuary) clearly shows that the Red Deer River is designated as one of the wildlife corridors that support the Sanctuary.

Further, in the section titled *45th Avenue* (GLSMP, Page 22) it states

"Habitat along 45th Avenue consist of dense stands of saskatoon (*sic*) (*Amelanchier alnifolia*), wild rose (*Rosa woodsii*), white spruce (*Picea glauca*), *Populus sp* and willow species (*Salix spp*), which run parallel to the Red Deer River. These strips of habitat are extremely rich in food for a wide variety of species as well as providing cover for movement."

In the section *Human Use and Influence* - Chapter 3, it states "Preservation of the Sanctuary from future developments is critical to the long term survival of the area" (GLSMP, page 48).

Landscapes at a Wider Scale

The Red Deer River Valley, the property at 45Ave and 59St, the Gaetz Lakes Sanctuary, and the East Hill Escarpment are all part of the same ecological system. Water flowing from the escarpment toward the river is utilised by the plants and animals along its flow. The fields on and around Gateway school and Parkland CLASS absorb that water and regulate its flow into the Red Deer River.

The reality is that the Sanctuary is being islanded. It is suffering "death by a thousand cuts". Its connection to the wider system is being almost constantly negatively affected by surrounding, ongoing development. The Clearview Ridge subdivision created a barrier between the Hunting Hills and the Sanctuary. The Michener Extendicare facility sits on the headwaters of Gaetz creek; the facility has had drastic, negative impacts on the flow and quality of water into the Sanctuary. The building of 67St and the bridges

across the river forced migrating deer and moose into tight corridors, breaking up the natural north-south routes across ravine and upland areas. The ball diamonds, fencing, and parking behind both Parkland CLASS and Gateway school have forced animals north to the grasslands adjacent to 45 Ave, and south onto 59 St, before they can get back into the Gateway open areas.

The Sanctuary *needs* connection to wider landscapes. It needs to have safe ingress and egress routes for the animals that call it home and for those passing through. It needs to have its outflowing water slowed by permeable surfaces. It needs to have unbroken connections between the landscapes that support it - grasslands, escarpment, the river, and the interstitial spaces. Without these connections, the Sanctuary loses biodiversity, and biomass. By extension surrounding environments lose the ecosystem services the Sanctuary provides.

Permitting this development will further isolate the Sanctuary and place the plants, animals, and systems that depend on it, at further risk.

We are re-submitting our feedback from December 2022 and January 2025, as those potential impacts remain.

Loss of Permeable Surfaces

While the existing schoolyard is not a natural environment, it is a permeable surface. Permeable surfaces allow for the slow, measured dissipation of rainwater and snowmelt by absorbing water, over a large area. This absorption prevents overland water flow and thereby reduces the opportunities for erosion.

Additionally, the permeable surfaces allow for a measure of filtration. Rainwater and snowmelt can pick up a vast array of substances as it flows over the ground. Many of these — road salt and de-icing chemicals, oil and other lubricants, pesticides and others — should not be flowing freely into our rivers and creeks. Permeable surfaces can act as a sort of pre-filter and reduce the load of these toxins in outflowing water.

By building on this land, the permeable surfaces are reduced. Building roofs, parking lots, driveways, and patios all act as physical barriers to permeable ground. These new hard surfaces concentrate water in a few locations and facilitate overland flow. This increased flow rate and volume increases the risk of erosion, placing the riverbank and riparian habitats at risk. Additionally, the increased overland flow loads the water with the previously-mentioned substances and debris, carrying them to the river unabated and unfiltered.

There is no substitute for natural, permeable surfaces over large areas. Rainwater catchment, and planter boxes can help, but they lack the depth and breadth of open permeable land. It is this depth and breadth that protects surrounding land from erosion, and reduces the impacts of surface pollutants.

Riverbank Stability

The Red Deer River has been increasingly threatened by development and subsequent erosion. There are numerous places along the river, through the City, where the bank has required armouring. The most visible examples are below Oriole Park West and below the houses along Cronquist Drive. Left to its own devices, the river would naturally erode the embankments creating natural cutbanks. The creation of these two neighbourhoods has necessitated the installation of the protection required to prevent the banks from eroding.

The bank armouring creates barriers to wildlife, removes potential spawning habitat, and interferes with the natural evolution of river systems. The proposed development is located on the outside of a bend in the river, as are the other two armoured locations. Water flows faster at the outside of the bend, than at the inside. Our concern is that the development would create additional stresses on the riverbank, necessitating armouring. The extremely narrow nature of this habitat linkage heightens the importance of keeping native vegetation and riverbank function intact and unchallenged by development stresses.

Barriers to Wildlife

Corridor connectivity is critical to the protection of biodiversity. The Red Deer River is a regional artery of life, comprising nearly continuous riparian habitat along its banks from Fort Normandeau down stream to River Bend. Many organisms including plants, invertebrates, herptiles, mammals and birds move and thrive along this corridor.

Perhaps one of the narrowest stretches of this corridor is along 45th Avenue, right at the site of this proposed development. This critical pinch point for the flow of biodiversity from south to north and east to west would certainly be impacted by the proposed development and the increased activity, traffic, impermeable surfacing, noise, lighting and various other impacts that it would undoubtedly bring.

Many of the wildlife species that presently move through this vital habitat linkage, especially the small ones that comprise the bulk biomass of biodiversity, are already at great risk due to the higher likelihood of roadkill that development would bring. Should development occur and traffic (foot and vehicle) increase there would doubtless be a greatly detrimental impact on biodiversity.

If anything this narrow linkage should be widened and encouraged east to allow for the flow of biodiversity to and from the Gaetz Lakes Sanctuary and MacKenzie Trails natural area. Major long-term land protection and habitat-rewilding on the proposed development site would support the health of the watershed, regional environment, and wildlife. Placing a large, massed structure on this site will be detrimental to local wildlife and birds that depend on the Gaetz Lakes Sanctuary, the riverbank, and the spaces between them.

Trail realignments

Looking at the Site/Context Plan it is clear that the existing South Bank Trail will be intersected by another driveway. It cannot be understated that this section of trail is extremely well-used by pedestrians, cyclists, scooter-riders, and skateboarders. Neighbourhood residents out walking their dogs, commuters headed into and out of downtown for work, and children heading to and from school all make use of this section of trail. These users already have to contend with the driveway that serves Parkland CLASS and Gateway School. A second driveway is going to drastically increase the chance of negative human/automobile interactions. This is an insurmountable problem as there is no space to realign the trail to avoid this driveway crossing.

Increases in Traffic

Although this has already been touched on, with any increase in residential populations comes an increase in traffic, increased infrastructure and development to accommodate that increased traffic, and an increased likelihood of wildlife/vehicle conflict. More cars equals more opportunity for negative interactions between wild animals and cars. Moose, foxes, deer, squirrels, weasels, chipmunks, beavers, hares, rabbits, snakes, salamanders all cross 45 Ave on their way to the riverbank. As the number of cars increases so does the possibility of animals being hit.

Increase in Pedestrian Traffic

Increased pedestrian traffic, especially now that it would be bottlenecked, can also lead to increases in negative human/wildlife interactions. Increased foot traffic and everything that comes with it (light, noise, garbage, etc) would restrict animal movement and potentially provide increased vectors of invasive plant/species movement.

Light Pollution

Nocturnal and crepuscular (active at dawn and dusk) animals rely heavily on the dark for cover and concealment. Their vision is uniquely adapted to low light environments. Some animals rely on being able to see the night sky for navigation and wayfinding. Perimeter lighting will create a barrier between the forest spaces around the perimeter and the feeding and watering areas (ponds, pond edges, shrubs) located in the point bar. Additionally the lighting that is proposed along the escarpment will have similar effects on wildlife. The escarpment is a major wildlife corridor. Many deer, moose, foxes, coyotes, and birds rely on the cover of the riverbank forest for safe passage across to First Island. Lighting will be as effective at restricting nocturnal and crepuscular animal movement, as would a physical fence. Artificial lighting also interferes with bird migration patterns; imagine the geese at River Bend never leaving.

A facility of this size will generate a tremendous amount of light, regardless of a dark skies lighting plan. Residents' own unit lighting will not be shaded or downward-firing. This alone will create an increased light-pollution situation. The light pollution has two,

seemingly counter-intuitive outcomes, with regards to wildlife. On the one hand, the spilled light creates areas of vulnerability for prey animals. Prey animals depend on darkness for cover. On the other hand, spilled light is an attraction for many animals. It illuminates food and cover. Ground floor patios and associated bird feeders are a powerful attractant for urban wildlife, setting up possible negative interactions with people.

These hazards are in addition to the danger presented to the myriad songbirds and bats that live in this area. Interior lit spaces appear to have no barriers to entry. Birds and bats fly into window panes and injure themselves or die.

Invasive Plant Species

To be classified as 'invasive,' a plant must cause harm to the other plants or organisms. Invasive plants can be harmful in many ways, such as by increasing in abundance so rapidly that they out-compete native varieties, or perhaps by being poisonous to consume. These plants are often generalists, which means they are able to grow on many types of landscapes and often thrive in challenging conditions such as in roadsides or disturbed areas. These invasive plants are by definition introduced plants that are not native to the area in question. The AB Government has determined various levels of classification when it comes to invasive plants: Noxious Weeds require control and Prohibited Noxious Weeds require eradication.

Despite best education efforts, housing often brings along invasive plant species. These plants have a tremendous impact on the Sanctuary.

At the direction of the GLSC, the Waskasoo Environmental Education Society spends several thousand dollars every year, controlling invasive plant species in the Sanctuary. The cost of hand-pulling, spraying with vinegar and salt, and hiring a herd of goats runs to roughly \$24,000. A development of the type permitted under proposed rezoning would undermine our decades of efforts in the Sanctuary, potentially exposing it to increased invasive seed dispersal.

Several invasive plants currently exist in the area and disturbance caused by development would certainly open the way for greater establishment of these species and the negative impact to the landscape that this would cause. Undisturbed soil structure and thriving native plant communities are important elements of healthy and resilient ecosystems.

Taking a wider view, the GLSC supports the citizens and organizations concerned with the havoc that this development can wreak on the Sanctuary. For 101 years, since the Gaetz family entrusted the land to Red Deer citizens, the Sanctuary has faced natural and man-made threats. Often, citizens rallied to protect the

Sanctuary. It is the Committee's sincere hope that the Municipal Planning Commission and The City, understand that protecting the Sanctuary and the broader landscape that includes the Red Deer River; the East Lincoln property; surrounding grasslands, wetlands, and riparian areas; and the Waskasoo neighbourhood.

The Committee is concerned that should this development be approved, other future projects adjacent to Red Deer's natural areas would have precedence to lean on; other undeveloped areas would potentially face similar development threats. The GLSC shares the WEES position that some natural spaces need to remain natural. The piece of land at 45 Ave and 59 Street is one of those spaces where the value and importance to the environment is greater than any proposed building development.

Thank you for considering this feedback. The GLSC supports the excellent comments and feedback provided by the Waskasoo Community Association and Red Deer River Naturalists. It is the Committee's hope that this decision will be made with a conservation mindset of protecting the fragile riparian wildlife corridor and biodiversity linkage of the proposed development area.

We welcome the chance to walk the property, surrounding area, and the Sanctuary; and to have a frank discussion about the potential damage to the Sanctuary, to wildlife, to the river and its role as a wildlife corridor, and to the greater ecological systems and services at large.

Sincerely,



Chair, Gaetz Lakes Sanctuary Committee

cc: Waskasoo Community Association
Red Deer River Naturalists
Waskasoo Environmental Education Society



November 13, 2025

Mayor Cindy Jefferies and Red Deer City Council
c/o Box 5008
Red Deer, Alberta
T4N 3T4

Re: Development Application Submitted for 4240 59 St.

Dear Mayor Jefferies,

We are writing to express our concerns regarding the proposed development permit application for a 48-unit seniors' supportive living apartment at 4240 59 Street in Red Deer.

As Red Deer Public Schools has many facilities in the immediate area of this proposed development, we are concerned about the impact this project will have on traffic, parking, and most importantly, student and pedestrian safety.

Two of our schools - Gateway Christian School (K-12, 760 students) and Lindsay Thurber Comprehensive High School (Grades 9-12, 1,785 students) - are located within the immediate area of 4240 59 Street. Each school day:

- Approximately 250 Gateway families drop off and pick up their children, along with seven large school buses and three small school buses carrying many children from across the city. These drop offs happen around the vicinity of the school, with many students having to cross the street or walk through the neighbourhood to get to the doors of Gateway.
- At Lindsay Thurber, more than 300 students drive their own vehicles to school. In addition, 17 City Transit buses and four Prairie buses arrive and depart from the school each morning and afternoon. Again, many of our students cross the street or walk through the neighbourhood to get to the school.

Traffic congestion and parking are already major challenges, particularly during school start and dismissal times. The administration at Gateway Christian School has had complaints from neighbouring residents regarding the high volume of traffic and parents parking or dropping students off in the residential areas. To help address this, Gateway directs families to use the gravel parking lot; however, with another development in the immediate area like the proposed 48-unit seniors' supportive living apartment, existing traffic and parking pressures will be increased.

In addition to Gateway and Lindsay Thurber, Red Deer Public's Facility Services building is located adjacent to The Memorial Centre. This building houses maintenance, tradesmen, and caretaking staff with their personal and work vehicles entering and exiting the area Monday to Friday.

The area is already highly congested during school days, and additional vehicles from construction activity and future residents will only compound existing issues. We are concerned that this increased volume will create significant safety risks for students and pedestrians navigating the area.

The safety of our students and staff are of the utmost importance. We respectfully ask that these traffic, parking, and safety concerns be carefully considered as you review the proposal.

Sincerely,

[Redacted Signature]

[Redacted Name]
Chair of the Board of Trustees



Orlando Toews
 City Planning and Growth Department
 City of Red Deer

December 9, 2022

**Re: 4240 – 59 Street
 Proposed Amendments to the Land Use Bylaw (Bylaw 3357/A-2023) and the
 Waskasoo Area Redevelopment Plan (Bylaw 3567/A-2023)**

Dear Mr. Toews,

It has recently come to the attention of the Red Deer River Watershed Alliance (RDRWA) that the City of Red Deer City Planning & Growth Department has received an application from the owners of 4240-59 Street requesting that the Land Use Bylaw (LUB) and the Waskasoo Area Redevelopment Plan (ARP) be amended to identify this parcel of land for higher density residential uses (i.e. R3) and rezone from its current designation of Public Service Lands (PS) (City of Red Deer, 2022). It is our understanding that as part of the City of Red Deer's application review process, all landowners in the Waskasoo neighbourhood are to be provided with an opportunity to review and comment on the proposed amendments. Although the RDRWA is not considered a direct resident of the Waskasoo neighbourhood, we are the designated provincial Watershed Planning and Advisory Council for the Red Deer River watershed. The RDRWA is writing to express concerns around these proposed amendments to the Waskasoo Area Redevelopment Plan. This development has the potential to negatively influence water quality, hydrology and habitat in the lower Waskasoo subwatershed and proximal downstream reach of the Red Deer River.

As a key partner in watershed management, the RDRWA values the longstanding and collaborative nature of our relationship with the City of Red Deer. The City of Red Deer and the RDRWA have worked together on several important initiatives since 2005, including the RDRWA's State of Watershed Report (2009a), and *Blueprint: An Integrated Watershed Management Plan (IWMP) for the Red Deer River Watershed* (2016). The RDRWA has also provided input and helped to set targets for the City of Red Deer's Water Conservation, Efficiency and Productivity Plan (2016), and the City of Red Deer's Environmental Master Plan (2019). We commend the City of Red Deer for its leadership and its inclusion of Watershed Protection as a key policy in the City of Red Deer's Municipal Development Plan (2013). Section 18.2 states that "The City shall participate in the activities of the Red Deer River Watershed Alliance in order to promote the effective integration of the management and use of land and water resources to ensure a legacy of ecological integrity and economic sustainability throughout the Red Deer River watershed." Additionally, a key goal of the IWMP is to maintain or improve the water quality in the Red Deer River by evaluating conditions relative to the site-specific water quality objectives (RDRWA 2016). To continue to meet IWMP water quality objectives in the mainstem, point and non-point source loadings (wastewater and stormwater runoff inputs) need to be cumulatively managed in this reach of the Red Deer river. The RDRWA have a vested interest in all developments in

close proximity to the river and its tributaries to ensure potential impacts are properly evaluated and mitigated. News regarding this development was not brought to our attention until recently, so we appreciate you considering our input after your original deadline.

The RDRWA has reviewed letters of concern submitted to the City of Red Deer from the Red Deer River Naturalists (RDRN) and the Waskasoo Community Association (WCA) related to this proposed land use change. In our opinion, the Waskasoo Community Association has provided a thoughtful and well-documented response to the proposed amendments and rezoning, and we support their comments as outlined in Section 4 - Environmental Concerns. Waskasoo Creek is the smallest sub-watershed in the Red Deer River basin, and it is an important tributary running through the City of Red Deer (RDRWA 2009).

The parcel of land proposed for rezoning is located in the downstream end of the Waskasoo Creek sub-watershed, in close proximity to the Gaetz Lakes Migratory Bird Sanctuary and the Kerry Wood Nature Centre. The area is prioritized as a hydrologically significant area (NCC & RDRWA 2021), being located relatively close (~30 meter) to the Red Deer River and having a narrow riparian zone. The RDRWA believes that any development in this location has the potential to negatively impact the environment. This would be contrary to the intent of both the City of Red Deer's Municipal Development Plan and City of Red Deer Environmental Master Plan (2019; Focus Area 1.2.2.1). Which has as part of its central goal which includes "*Sustaining our water resources includes understanding and effectively managing issues such as water conservation, water quality protection, watershed well-being, and storm and surface water management*". Land use changes and the subsequent changes in management practices have the potential to impact both water quantity and quality within Waskasoo Creek and the downstream Red Deer River reach. The RDRWA has concerns with wetland and riparian loss as it creates terrestrial and aquatic habitat fragmentation with negative consequences to wildlife, fish and other organisms in adjacent and receiving downstream aquatic environments. Given the close proximity of the proposed development to the Red Deer River, we were also surprised a storm and surface water management plan was not included with the information to stakeholders.

The RDRWA works to promote watershed health and particularly to maintain or restore riparian areas. Riparian lands have substantial ecological, economic, and social value, and as such, the effective management of these habitats is a critical component to the maintenance of watershed health. From 2020-2022, the RDRWA conducted a comprehensive riparian habitat assessment of the Medicine-Blindman Rivers sub-watersheds, which includes Waskasoo Creek (Fiera 2022). These areas have been identified by the RDRWA as an important source water protection zone for the City of Red Deer and downstream municipalities and are considered a high priority for flood and drought mitigation. Riparian areas play a vital role in the interception of sediments and nutrients that runoff from adjacent upland areas. Riparian vegetation also provides shade and regulates water temperature, ensuring suitable habitat for a range of aquatic species. Furthermore, riparian habitats stabilize the banks of waterbodies and help modulate water velocities and high-water events, thereby improving water quality and protecting surrounding lands from flooding. Given the significant role that an intact riparian zone has on providing ecosystem services and supporting healthy and functional aquatic ecosystems, there is a need for effective management and conservation of riparian areas.

Of the 24 named waterbodies assessed by the RDRWA in the State of the Watershed report (2009b), Waskasoo Creek was one of six creeks that had more than 50% of their shorelines classified as either High or Moderate Restoration Priority. The RDRWA encourages the City of Red Deer to continue to focus on minimizing impacts and cumulative land use change and maintain no net increase in local catchment pressure and protect and restore riparian areas. The Waskasoo Creek sub-watershed was also identified as an important groundwater recharge area within the Red Deer River watershed (4.7.4.5 RDRWA 2009a). The RDRWA SOW (2009b) also identified substantial data gaps for the Waskasoo Creek sub-watershed. Knowing where groundwater recharges and discharge areas occur help to identify areas requiring special protection and limitations, particularly to below grade land use development.

It is our recommendation that the City of Red Deer continue to carefully consider the potential implications of any proposed land use changes within the Waskasoo Creek sub-watershed, and evaluate and present land use planning decisions with supporting information on: baseline water quality conditions, hydrology and hydraulic modelling and assessments (e.g. GOA 2022; Red Deer River Hazard Study), channel stability assessments, storm water management, and surface and groundwater interaction assessments under flood prediction modelling for below grade developments.

The RDRWA is committed to continue working with the City of Red Deer to advance shared watershed management planning around water quality, riparian areas and wetlands, and land use. Based on existing information, the RDRWA has concerns with the information provided on the land use change and proposed development. We hope that the City of Red Deer will take our comments into consideration and keep us informed of further details of this potential development. We would be willing to complete a more thorough review if adequate time and additional relevant studies were made available. We would also appreciate being apprised of other prospective developments within the Red Deer River corridor into the future.

As a longstanding and valued partner of the RDRWA, we look forward to continuing to work with the City of Red Deer on environmental and planning-related activities. We are committed to working collaboratively with the City to advance watershed management objectives and strengthen our shared understanding of hydrological and ecological processes that support our collective vision of maintaining a lasting legacy of watershed integrity and ecological health for the citizens of Red Deer and the broader watershed.

Sincerely,

A black rectangular box redacting the signature of the Executive Director.

Executive Director

On behalf of The Red Deer River Watershed Alliance

List of References

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Gaetz Lakes

WASKASOO

AREA REDEVELOPMENT PLAN

Waskasoo is a neighbourhood of trees and trails, rivers and creeks, beautiful old homes and great schools. Our diverse community values and shares a wealth of natural, artistic and historical riches.

Bylaw Number: 3567/2016
Adopted by City Council
on: February 1, 2016



www.reddeer.ca/waskasoo



FIGURE 1 - AERIAL PHOTO OF THE WASKASOO PLAN AREA

Waskasoo Neighbourhood Plan

Area Redevelopment Plan

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Waskasoo Neighbourhood Plan

Area Redevelopment Plan

1.0 Introduction

The Waskasoo neighbourhood contains historical homes, tree-lined streets, a variety of public service facilities and an abundance of parks and open spaces. Located near the Red Deer River and north of The City's downtown core, Waskasoo plays an important role in Red Deer's cultural and natural history. The Waskasoo Neighbourhood Plan has been prepared to guide the future development and redevelopment of the Waskasoo neighbourhood and is divided up into two parts based on their approval processes and implementation responsibility:

Part 1: Area Redevelopment Plan. The Area Redevelopment Plan (ARP) contains the statutory portion of the Waskasoo Neighbourhood Plan and The City of Red Deer is responsible to lead the implementation. In the *Municipal Government Act*, an Area Redevelopment Plan is defined as a statutory plan, meaning it must be adopted by Council under a Bylaw. The ARP policies address identity, land use, and movement. Character Statements are introduced to capture the character defining attributes of a specific geographic area and determine the compatibility of a development or redevelopment proposal. These Character Statements will be contained in *Redevelopment Design Guidelines*, a planning tool that prescribes design regulations for redevelopment proposals.

The ARP portion of the Waskasoo Neighbourhood Plan was adopted by Council on February 1, 2016 under Bylaw 3567/2016.

Part 2: Community Plan. The Community Plan (CP) is the non-statutory portion of the Waskasoo Neighbourhood Plan. A non-statutory plan is approved by Council as a planning tool to assist the community in achieving the vision created for their neighbourhood. The CP component contains community-led policy recommendations where The City of Red Deer and the community will work in conjunction with the Waskasoo Community Association to accomplish these recommendations.

The CP portion of the Waskasoo Neighbourhood Plan was adopted by Council on February 1, 2016 under resolution number 5.

These two separate but interlinked parts of the Waskasoo Neighbourhood Plan clearly illustrate the collaborative approach needed between The City of Red Deer and the Waskasoo community to achieve the objectives of the overarching Waskasoo Neighbourhood Plan. The two plans were prepared together and then separated based on their different approval processes and where implementation responsibility lays.

1.1 Mandate and Alignment with Other Plans

The preparation of the ARP component is authorized under section 634 of the *Municipal Government Act* (MGA) and section 635 of the MGA specifies that the following items must be addressed in an ARP:

- a) (an ARP) must describe:
 - i. The objectives of the plan and how they are proposed to be achieved,
 - ii. The proposed land uses for the redevelopment area
 - iii. If a “redevelopment levy” is to be imposed, the reasons for imposing it, and
 - iv. Any proposals for the acquisition of land for any municipal use, school facilities, parks and recreation facilities or any other purposes the Council considers necessary, and
- b) May contain any other proposals that the Council considers necessary.

Section 638 of the MGA requires that all statutory plans adopted by Council are consistent with one another. The two governing statutory plans for the Waskasoo neighbourhood are The City of Red Deer *Municipal Development Plan* and a portion of the plan area falls within the *East Hill Major Area Structure Plan*; the ARP is consistent with the direction contained in these statutory plans.

Development and redevelopment of the Waskasoo neighbourhood is also guided by the following non-statutory plans and other planning documents:

- *Red Deer Trails Master Plan*;
- *Greater Downtown Action Plan*;
- *Waskasoo Park Interpretive Master Plan*;
- *Land Use Bylaw 3357/2006*;
- *Council’s Strategic Plan*; and
- *Neighbourhood Planning and Design Standards*.

The MGA does not require the ARP be consistent with the aforementioned non-statutory plans and other planning documents; however care has been taken to ensure the ARP complies with the direction contained within them.

Any redistricting (rezoning) that takes place subsequent to the adoption by Council of this document will require an amendment to the plan to align with the change unless exempted herein. There are no proposed changes to the Land Use Districts (zoning).

1.2 Interpretation

Wording contained in the ARP policies are intentional and contain “shall”, “should” and “may” statements. Policy statements that contain “shall” are those which must be followed. “Should” statements mean compliance to the policy is required but the Development Authority has some discretion based on the circumstances of the specific case. “May” statements indicate that the Development Authority determines the level of compliance that is required.



FIGURE 2 – WASKASOO NEIGHBOURHOOD PLAN AREA

2.0 Vision

An integral part of preparing the Waskasoo Neighbourhood Plan was determining a vision for the community. A community identity workshop was hosted on May 8, 2014 at the Streams Christian Church where Waskasoo landowners, residents and stakeholders worked together to find a common vision for the Waskasoo Neighbourhood Plan. The following community vision was established:

“Waskasoo is a neighbourhood of trees and trails, rivers and creeks, beautiful old homes and great schools. Our diverse community values and shares a wealth of natural, artistic and historical riches.”

2.1 Objectives

The MGA requires identification of the ARP objectives. These objectives are established to achieve the community vision by forming the basis for the policies contained within. As Waskasoo redevelops and evolves throughout time, the ARP is set out to accomplish the following objectives:

1. Ensure development and redevelopment of properties is sensitive to the existing neighbourhood character and pattern of development created by street design, lot sizes and distribution, mix of uses and general density of development.
2. Maintain Waskasoo’s extensive parks and open space.
3. Preserve and maintain environmental, historical and cultural features.
4. Maintain and enhance trail and pedestrian connections.
5. Encourage the enhancement and maintenance of all properties.

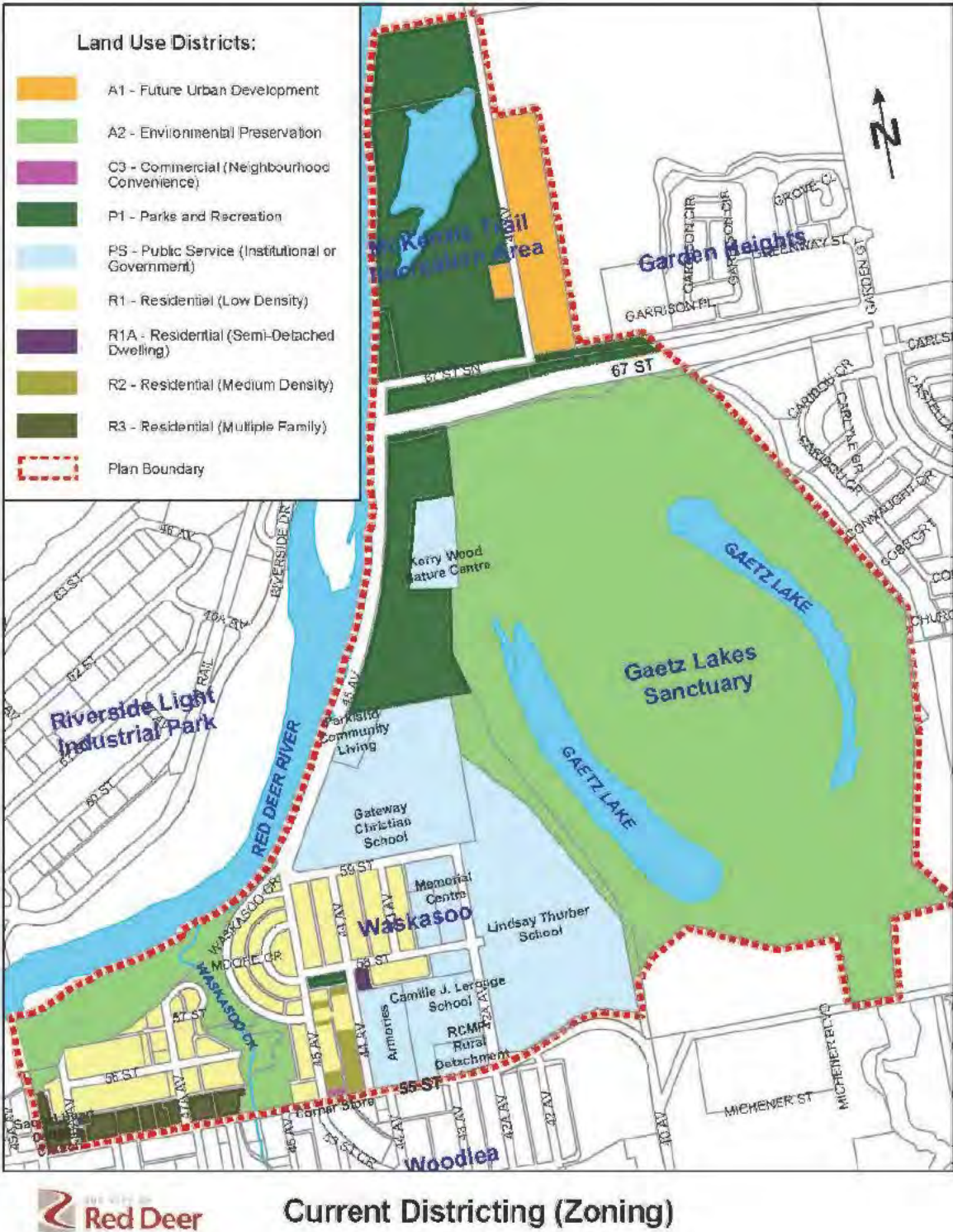


FIGURE 3 – WASKASOO NEIGHBOURHOOD PLAN AREA CURRENT DISTRICTING (ZONING)

WASKASOO

AREA REDEVELOPMENT PLAN

Waskasoo is a neighbourhood of trees and trails, rivers and creeks, beautiful old homes and great schools. Our diverse community values and shares a wealth of natural, artistic and historical riches.

PLAN OBJECTIVES

- 1 Ensure development and redevelopment of properties is sensitive to the existing neighbourhood character and pattern of development created by street design, lot sizes and distribution, mix of uses and general density of development.
- 2 Maintain Waskasoo's extensive parks and open space.
- 3 Preserve and maintain environmental, historical and cultural features.
- 4 Maintain and enhance trail and pedestrian connections.
- 5 Encourage the enhancement and maintenance of all properties.

PLAN RECOMMENDATIONS

IDENTITY

1 Maintain Character

Redistricting, development, redevelopment, and subdivision shall conform to the *Land Use Bylaw*, and reflect the Character Statements (Appendix 1) and the *Redevelopment Design Guidelines*.

2 Maintain Tree Cover

The Development Authority may require a Tree Preservation Plan as part of a Development Permit Application. If required, a Tree Preservation Plan must contain details about the existing landscaping on the lot(s), including the approximate diameter of trees (measured at breast height (ie) 1.3 metres above ground) and a written statement by a qualified professional on the health of the tree(s) proposed to be removed, retained or relocated shall accompany the Tree Preservation Plan.

LAND USE

3 4240 – 59 Street

4240 – 59th Street shall retain its current PS Public Service (Institutional or Governmental) District designation. Additional studies, such as a Geotechnical Assessment, Traffic Impact Assessment and a Servicing Study shall be required to support an application for development or redevelopment.

4 Estate Residential Lots

All estate residential lots (currently zoned A1) shall not have any further intensification through an increase in the number of dwelling units, including secondary suites, or lots.

5 Low Impact Commercial Overlay District

Any applications received for a Low Impact Commercial Overlay District within the Waskasoo Plan area will not require a Plan Amendment.

6 Designation of Historic Sites

Owners of historic homes are encouraged to work with The City to designate properties as Historic Sites. Designation will assist in the long term preservation of these unique and important pieces of Red Deer's history. (Appendix 2)

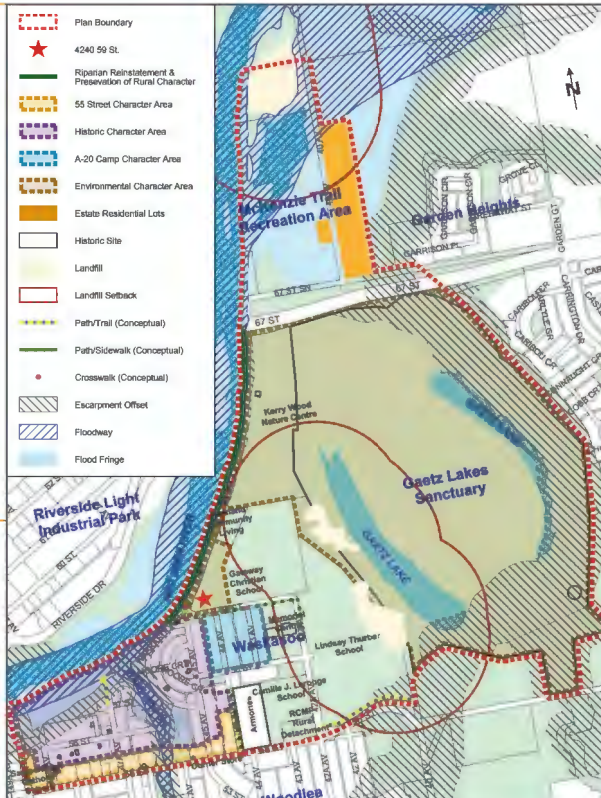
MOVEMENT

1 Missing Links

Sidewalks that are missing or desired will be included in the Capital Sidewalk Program. (Appendix 3) All new or replacement sidewalks and trails should meet the applicable municipal construction standards in place at the time. The City of Red Deer Recreation, Parks and Culture Department, Parks Section and the Waskasoo Community Association to investigate the potential of adding a natural trail to the riverbank.

2 Parks and Trail Network

The Waskasoo Park Interpretive Master Plan and other, new or subsequent applicable documents such as the Red Deer Trails Master Plan shall guide development and redevelopment in Waskasoo Park, the Gaetz Lakes Sanctuary, Kerry Wood Nature Centre and the McKenzie Trails Recreation Area. Efforts should be made to reduce tree loss and impacts to root zones.



IMPLEMENTATION

Maintain Character

The City of Red Deer will initiate amendments to the *Land Use Bylaw* to reference the *Redevelopment Design Guidelines* and expand the applicable residential and commercial land use districts.

Maintain Tree Cover

The City of Red Deer undertook in October, 2015, amendments to the *Land Use Bylaw* which enabled the Development Authority to require additional information at the Development Permit Application stage.

Preservation of Rural Character

Throughout review and implementation, the City of Red Deer will address concerns identified by Federal and Provincial Regulations such as, but not limited to, the protection and enhancement of fish and wildlife habitat, ecosystems and historical resources within riparian areas. The review will assist in determining the most beneficial road cross section for 45th Avenue, north of 59th Street, aiming to retain its rural character within the riparian area and the gateway to the Gaetz Lakes Sanctuary/Kerry Wood Nature Centre. Long range options should be considered to improve the long term health of the river bank.



www.reddeer.ca/waskasoo

Questions? Contact the Planning department at planning@reddeer.ca

ARP Appendix 1

Waskasoo Character Statements

City of Red Deer Planning Department

These Character Statements form part of the Waskasoo Area Redevelopment Plan and are incorporated into and form part of The City of Red Deer Land Use Bylaw

12/15/2015

Waskasoo Character Statements

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1. Introduction

All neighbourhoods contain the same basic elements; individual properties, and public infrastructure such as streets, sidewalks, lighting, and utilities. What establishes the character of a neighbourhood is the relationship and design of these basic elements. When redevelopment of private property or public infrastructure occurs, concerns over losing the “character” of a neighbourhood are often raised. The following Character Statements define the “character” of a specific geographic area by capturing the design elements that make one geographic area different from another.

Character Statements are not necessary for every neighbourhood in The City of Red Deer, they are useful for specific geographic areas that meet the following criteria:

- They contain a combination of elements that together make an area unique or special; or
- The ‘Character’ is specifically identified and design guidance given to redeveloping an area intentionally.



Each Character Statement contains the following information which serves to define the overall characteristics:

- Character Statement Area Map
- Context and History
- Common Forms and Scale of Buildings
- Common Building Materials
- Other Common Elements
- Recommended Design Elements

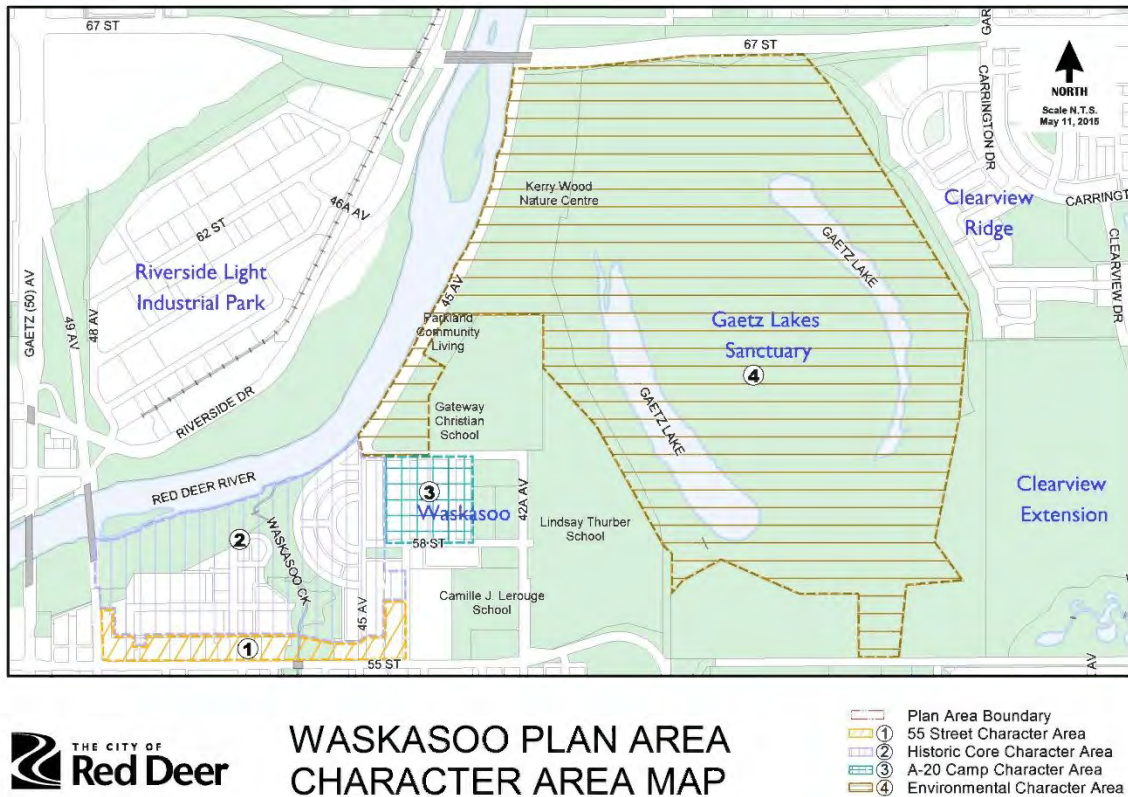
1.1 Intent of Character Statements

The intent of the Character Statements is to define some design parameters to which a new proposal for redevelopment within a defined area should adhere.

The Character Statements specific to the Waskasoo neighbourhood were developed with assistance from community members and the Waskasoo Community Association. Their assistance made it possible to create these Character Statements and their sincere efforts are greatly appreciated.

The Waskasoo neighbourhood is divided into four (4) distinct Character Areas, highlighted in the following map. Character Statements have been created for each of the four (4) Character Areas.





All of the photographic images used in the following Character Statements, unless otherwise noted, were taken by The City of Red Deer Planning Department in 2014 or 2015, or contributed by the community. Assistance from the community, by the Waskasoo Community Association, and their individual members are greatly appreciated and recognized.

1.2 How Character Statements are Applied

When an application for development permit to redevelop a lot, or a subdivision application is received, City Administration will evaluate the application based on conformity with:

- The City of Red Deer statutory plans (including but not limited to the *Municipal Development Plan, Area Structure Plans, Area Redevelopment Plan*);
- The *Land Use Bylaw*;
- Consultation with internal City departments and landowners within 100 m of the subject lot;
- The *Redevelopment Design Guidelines* planning document;
- The applicable Character Statement; and
- The contents of the Letter of Intention submitted by the Applicant with Development Permit applications for redevelopment within a Character Statement area.

Character Statements are a planning tool that will be applied in conjunction with the generally applicable *Redevelopment Design Guidelines* and The City of Red Deer's *Land Use Bylaw* to evaluate if an application maintains the character of the area. Where the regulations in the *Land Use Bylaw* or the *Redevelopment Design Guidelines* conflict with the



Character Statements, the Character Statements shall prevail. The Context and History, Common Forms and Scale of Buildings, Common Building Materials and Other Common Elements sections within each Character Statement identify various aspects that add to the distinct character and should be considered when evaluating whether a proposed development complements or maintains the character of the area.

A Letter of Intention shall be submitted by the Applicant with Development Permit applications for redevelopment within a Character Statement area addressing how the proposal is sensitive to the Immediate Street Context as identified in the relevant Character Statements.

The Character Statements may only be amended in accordance with the procedures set out in the Municipal Government Act for amendments to a Land Use Bylaw.

1.3 Properties Designated Historical Preservation or Historical Significance

Applications for properties that are identified in the City of Red Deer's LUB as HP (Historical Preservation) or HS (Historical Significance) are to be reviewed applying the *Standards and Guidelines for the Conservation of Historic Places in Canada* as well as *Alberta's Creating a Future for Alberta's Historic Places*. The Federal and Provincial requirements take precedence over The City of Red Deer's requirements.

1.4 Interpretation

Wording contained in the following Character Statements are intentional and contain "shall", "should" and "may" statements. Character Statements that contain "shall" are those which must be followed. "Should" statements mean compliance is required but the Development Authority has some discretion based on the circumstances of the specific case. "May" statements indicate that the Development Authority determines the level of compliance that is required. Terms identified by capitalized first letter are found in the Definitions section of this document.

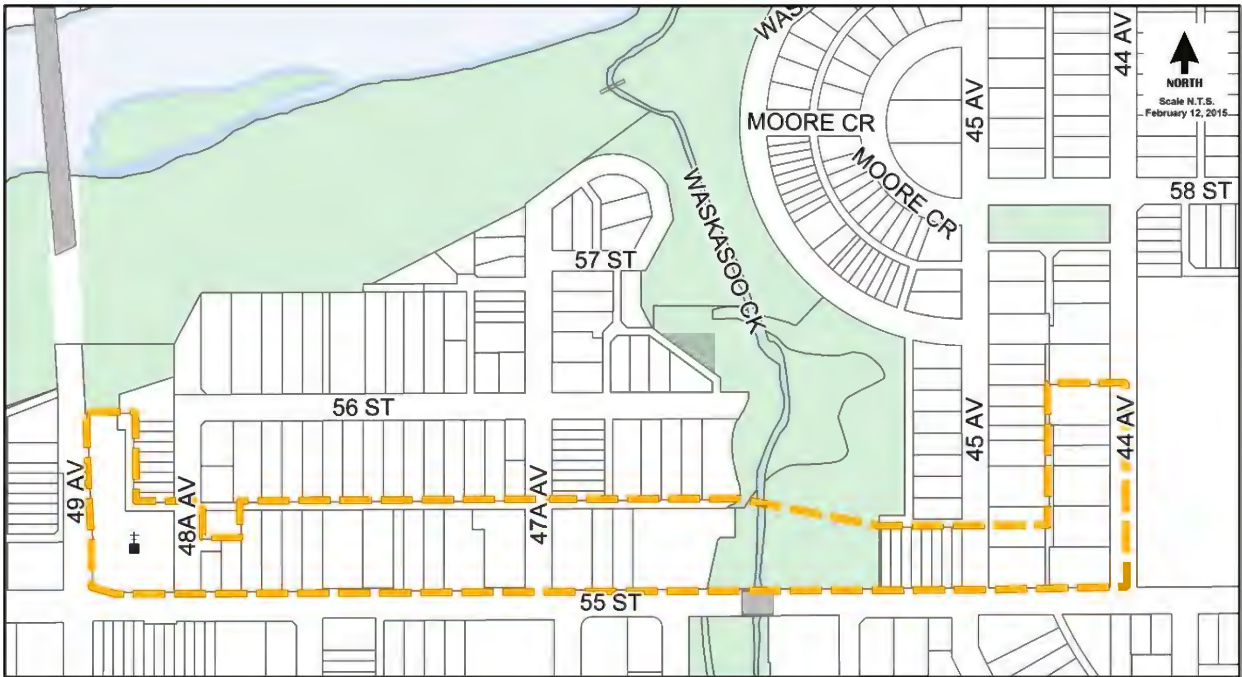
Tree Preservation is important to the Community consequently the following Waskasoo Area Redevelopment Identity Policy 2 – Maintain Tree Cover applies to all Character Areas.

The Development Authority may require a Tree Preservation Plan as part of a Development Permit Application. If required, a Tree Preservation Plan must contain details about the existing landscaping on the lot(s), including the approximate diameter of trees (measured at breast height (ie) 1.3 metres above ground) and a written statement by a qualified professional on the health of the tree(s) proposed to be removed, retained or relocated shall accompany the Tree Preservation Plan.



2. 55th Street Character Statement

2.1 Character Statement Area Map



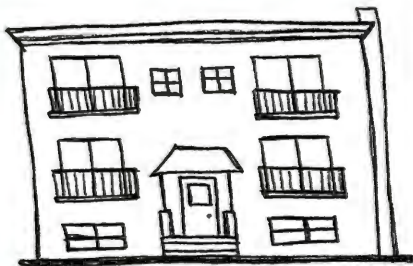
WASKASOO PLAN AREA
55 STREET CHARACTER AREA

2.2 Context and History

The 55th Street area is predominantly comprised of walk-up style apartment Buildings, with the exception of the ten (10) existing single detached dwellings on the eastern limits of the Character Area, a commercial site at the corner of 45th Avenue and 55th Street, and the Sacred Heart Catholic Church at the corner of 49th Avenue and 55th Street. As 55th Street became more of a major thoroughfare the single detached dwellings were, for the most part, replaced with walk-up style apartment Buildings.



Single Family Dwelling



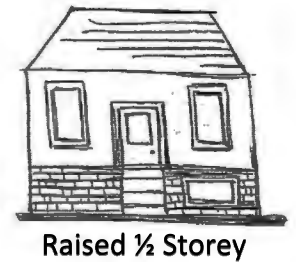
Walk-up Style Apartment

Apartment Building on 55th St.

The single detached dwellings were the first style of residence built in the Character Area, and were built between 1928 and 1956. The original Sacred Heart Catholic Church was constructed in 1925. It was replaced with the existing larger church Building in 1959. The multiple family apartment Buildings that replaced the original single detached dwellings were built between 1963 and 1979.

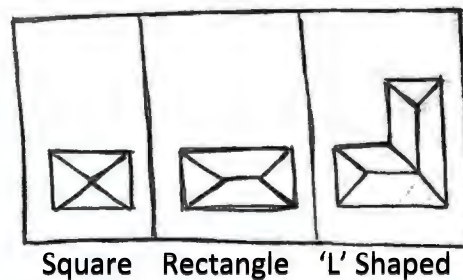
2.3 Common Forms and Scale of Buildings

- Apartment Buildings ranging from 2 to 3 storeys that are raised a half-storey to allow light into the basement units.
- Apartment Buildings generally have vehicular access and gravel parking areas located at the rear with a generous, landscaped Front yard.
- The single detached dwellings are all 1 or 1½ storeys with very simple traditional square, rectangular, or 'L' shaped Building footprints with minimal decorative details.
- The Sacred Heart Catholic Church is a unique, purpose-built Building with large gravel parking area to the north of the Building and fully exposed to 49 Avenue



2.4 Common Building Materials

- Brick
- Wood
- Stucco
- Metal
- Vinyl siding/cladding



Apartment Buildings along 44th Avenue



Apartment Building on 55th Street

2.5 Other Common Elements

- Apartment Buildings with projecting balconies, flat roofs, and prominent front entries

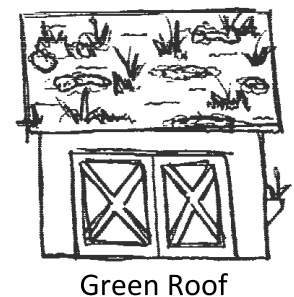
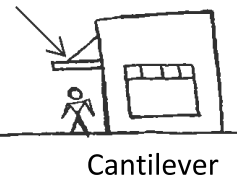
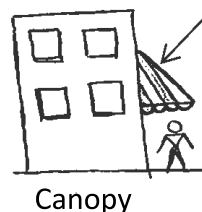
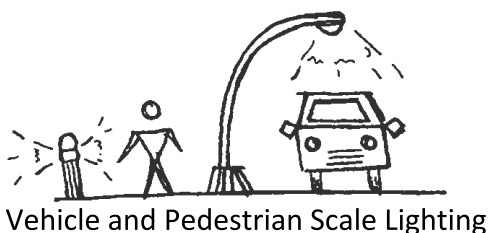
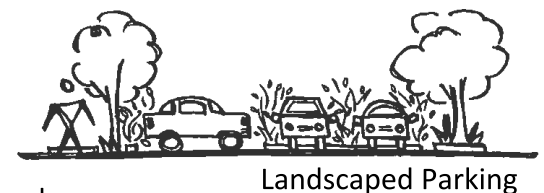
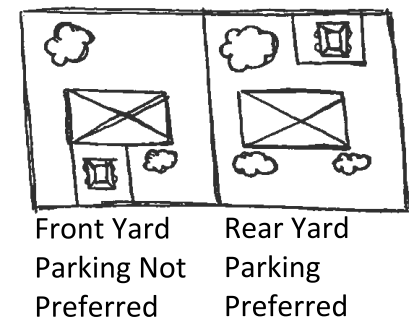
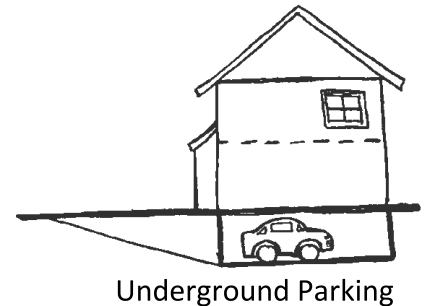
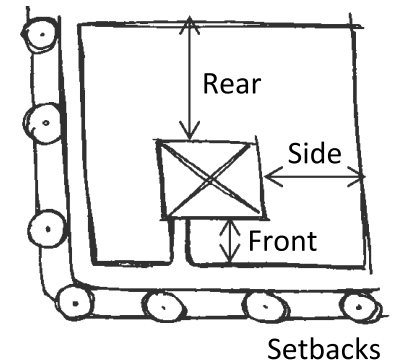
Apartment Building with **balconies**, **flat roof**,
and **prominent front entry**



- Mature trees and Landscaping, some trees are identified in the *Land Use Bylaw* as having Historical Significance (HS).

2.6 Recommended Design Elements

1. Front, side, and Rear Yard Setbacks around Buildings shall be maintained to preserve existing mature Landscaping, to allow successive trees to mature or be planted, and to maintain privacy and seclusion. Every effort should be made by property owners to save existing mature trees.
2. Existing specimen conifer and deciduous trees shall be identified on a site plan/tree preservation plan and protected during site construction activities and after by ensuring Buildings, services or Hard Surface areas are not sited too close.
3. New trees planted should be of a species, preferably native, that is currently found in the 55th Street Character Area and tolerant of the streetscape conditions.
4. New multiple family Buildings shall locate parking underground or on Hard Surface parking areas at the rear or side of the Building. Parking areas located in the Front yard shall not be permitted. Parking areas shall be landscaped in accordance with the Landscaping requirements of the *Land Use Bylaw*, shall have direct pedestrian connectivity to the Building and public street, and shall be designed to accommodate the needs of our climate by using such design elements as terracing, canopies or Cantilevers at Building entrances to provide weather protection, and the use of pedestrian and vehicular Scale lighting as appropriate to enhance safety and security.
5. The development and redevelopment of multi-family buildings shall be upgraded in terms of design quality, materials and construction quality as well as Landscaping as deemed appropriate to the highly visible location and proximity to downtown.
6. Multiple family Buildings shall have private, useable balconies that are incorporated into the building design.
7. The use of flat roofs as functional Green Roofs is encouraged.



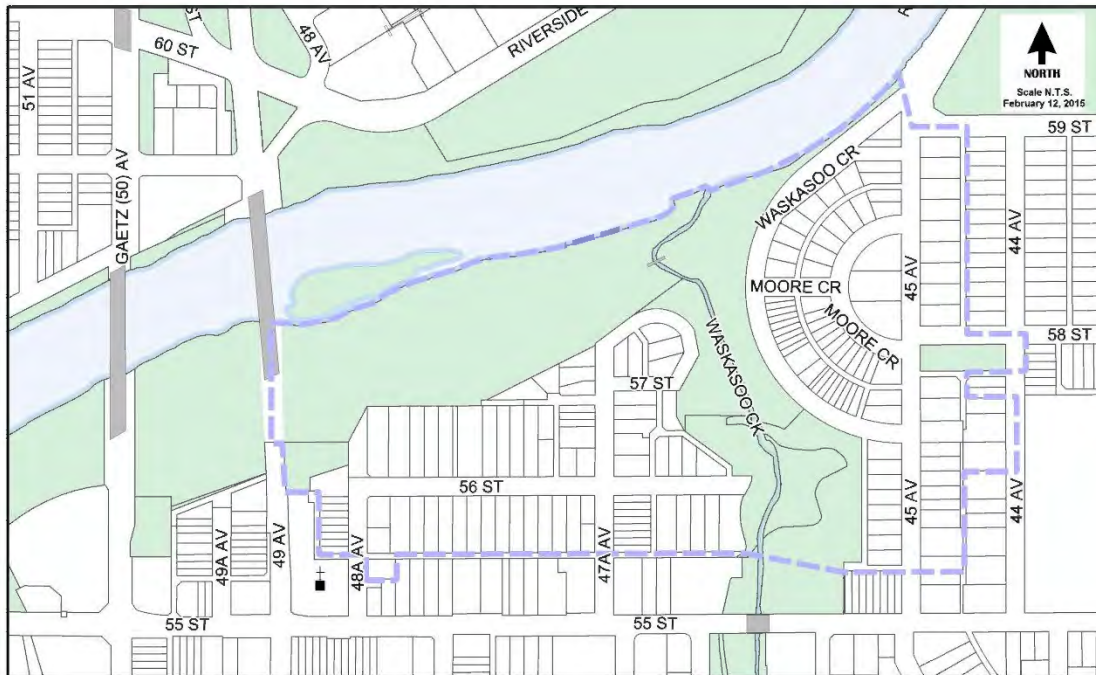


Sacred Heart Church 5508 – 48A Avenue

Apartment Buildings along 55th Street

3. Waskasoo Historic Core Character Statement

3.1 Character Statement Area Map



WASKASOO PLAN AREA HISTORIC CORE CHARACTER AREA

3.2 Context and History

The Waskasoo historic core includes two separate historic areas bisected by Waskasoo Creek that have many common elements. This Character Area contains a number of historic residences and numerous dwellings constructed in the decade after WW II. The area is significant for its association with the theme of early residential development in Red Deer. Several of the homes were built prior to the economic crash of 1913 as part of the early residential development that occurred in the first decade

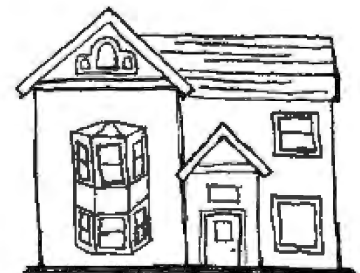
of the twentieth century. This Character Area includes a significant number of The City of Red Deer's listed heritage properties.

The Waskasoo neighbourhood is associated with two important Urban Planning movements; the Garden City and City Beautiful. The City Beautiful movement emphasized grandeur, order, symmetry, and harmony in the built environment believing that these qualities would consequently be inspired in the residents. The Garden City movement emphasized the creation/maintenance of parks, green spaces, spacious lawns and gardens. Both sides of the creek exhibit characteristics of both movements. Both movements worked together and focused on different aspects. City Beautiful is a beautification and functional architectural design based movement and Garden City was a city and subdivision urban planning movement. Moore Crescent and Waskasoo Crescent were laid out along Waskasoo Creek and the Red Deer River following these principles thus lending the now century old area a unique charm and park-like quality.



November 1948 - Aerial Photo of the Waskasoo Neighbourhood (Red Deer and District Archives; P210)

East of Waskasoo Creek, the historic homes were built between 1905 and 1923, shortly after William Addison Moore subdivided the land by the river into suburban lots. William Moore was one of Red Deer's founding fathers; he was the Manager of the Western Telephone Company and Western General Electric, and original owner of the historic Moore Residence located along 45th Avenue. Many of the dwellings within this area were built between 1900 and 1912 and began the establishment of the aesthetics of the Waskasoo neighborhood. These Buildings include 2 ½ storey Edwardian style dwellings such as the Moore, Galbraith, Simpson and the Weddell Residences along with 1 ½ storey Craftsman style bungalows such as the Sharman and the Russell Residences.



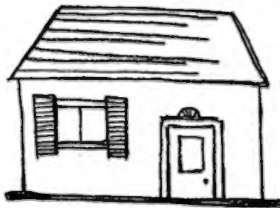
2 ½ Storey Edwardian Style

West of Waskasoo Creek the central focus surrounds "Son-in-law Row" (56th Street) which is a picturesque, residential street near the downtown and a local landmark in the former subdivision known as River Park. This name, "Son-in-law Row", refers to the fact that some of the dwellings located in this area were originally constructed for the daughters and sons of the early founding father of Red Deer, Rev. Leonard Gaetz. This area also reflects the philosophies of the Garden City and City Beautiful movements, although less rigidly and obviously as Moore and Waskasoo Crescents. The historic dwellings were built between 1903 and the 1930's. There is an additional grouping of post war homes from the 1940's and 1950's and some more modern dwellings as well.

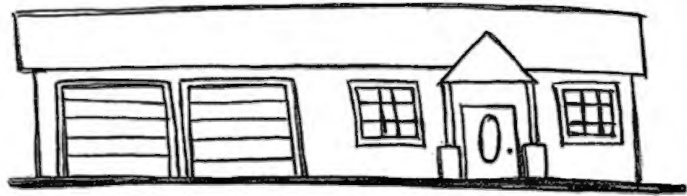


1 ½ Storey Craftsman Style

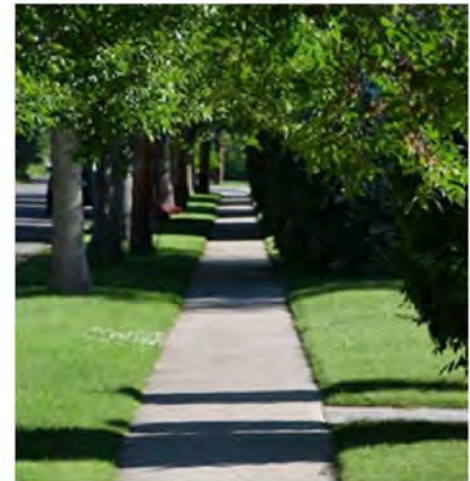
These historic dwellings are joined by numerous 1 storey and 1 ½ storey dwellings built from approximately 1946 to 1955. These dwellings reflect post-war/oil-boom residential development in The City of Red Deer when many small homes were built on lots that had remained empty since the 1913 economic crash. The majority are in the Minimal Traditional and Ranch architectural styles.



Minimal Traditional Style



Ranch Style



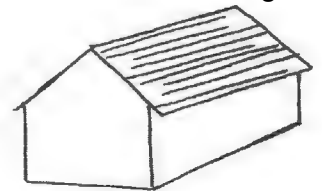
Separated sidewalks with tree lined streets

3.3 Common Forms and Scale of Buildings

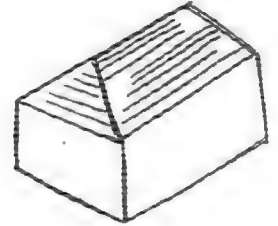
- Pre and post-war single detached dwellings ranging in size from small 1 storey dwellings to large 2 ½ storey dwellings influenced by Edwardian, Queen Anne, Foursquare, Arts and Crafts, Prairie and Craftsman architectural styles. Refer to the definitions section for additional information related to these architectural styles.
- 1 and 1 ½ storey post-war dwellings built in the 1940's and 1950's, in the the Minimal Traditional and Ranch architectural styles.
- Gable and Hip Roofs, often with Dormer windows, creating living space within the roof and

some type of porch entry feature with a Prominent Entry are common. The use of cornices, Dentils and decorative shingle cladding in the Gable ends is a common feature as is a symmetrically designed front façade with a prominent main entrance.

- Detailing from other architectural styles, such as Gothic or Tudor, often Scaled down elements.
- Consistent relationship between sidewalk location, finished floor elevations, Building Front Yard Setbacks, street tree locations, and road widths.
- Mature trees within the boulevard area.
- Larger lots with generous Front and side Yard Setbacks that are well treed and landscaped adding to the aesthetic appeal of the streetscape. On 56th Street, known as “Son-in-Law” Row, some homes have large Front Yard Setbacks.
- Scale is related to architectural style and should be reflected in the building design. For instance, 1 to 1 ½ storey dwellings have a Minimal Traditional or Ranch architectural style, and have a smaller square footage than what became common after WW II.



Gable Roof



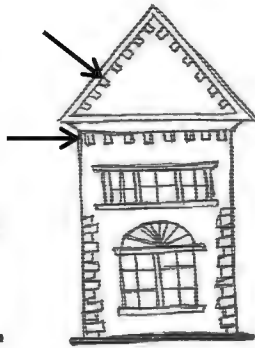
Hip Roof



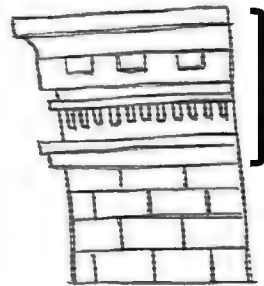
Dormer Window



Prominent Entry



Dentils



Cornice



Decorative Shingle Cladding



F.W. Galbraith Residence (HS 21)



Simpson Residence (HS 56)

3.4 Common Building Materials

- Wood cladding (wood shingle cladding, clapboard siding) or wood-replica siding
- Brick or stucco; Stone, river rock, sandstone
- Asphalt shingles or cedar shakes
- Stone, sandstone, cement, cement block or brick foundations



Detached Garage

3.5 Other Common Elements

- Mature tree lined streets with separated sidewalks
- Large well landscaped, maintained yards complete with mature vegetation
- Rear gravel lanes for vehicular access with a detached garage - Only lots with no rear lane have front driveways, garages and/or parking pads
- Very walkable streets. The streets and trails becoming informal meeting places



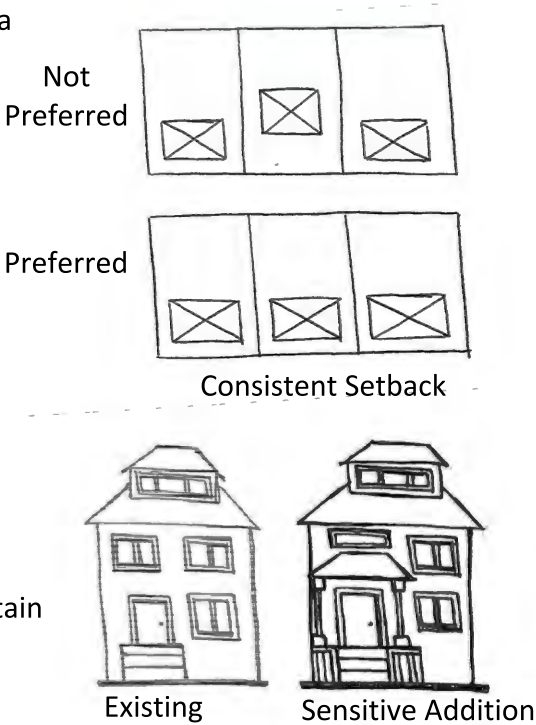
J. Weddell Residence (HS 30)



Bill Lodewyk Residence

3.6 Recommended Design Elements

1. A Tree Preservation Site Plan shall be required to accompany a development permit application in this Character Area which shall identify by location, type and size, all existing trees, natural and manmade features, Boundary hedges and landscaped boulevards. The Plan shall identify what is to be removed/relocated/preserved on site as well as any proposed tree replacements required as a result of tree removal.
2. Lots shall be compatible with and similar to the width, depth, and area of properties existing within the Immediate Street Context as the proposed redevelopment.
3. Dwellings shall be sited on the lot to be compatible with the existing pattern of dwelling placement, in terms of front, side, Flankage, and Rear Yard Setbacks prevalent in the Immediate Street Context.
4. Slight variance to Front Yard Setback may be allowed to maintain existing natural features/ trees and to better align with the Immediate Street Context.
5. Sensitive additions proposed to the front façade should be supported when the Front Yard Setback, Building design, siting and materials utilized are compatible with the Immediate Street Context. Each proposal would be assessed individually and would look at the proposed location in relation to the existing Building footprint, average of Setbacks in the Immediate Street Context and impacts to existing mature vegetation.
6. Exterior Building Materials and colours should be reflective of, similar to and compatible with



those present within the Immediate Street Context. Distinct accent colours are encouraged.



Reflecting Common Building Materials and Colors

7. Dwellings shall have a prominent primary entrance on the main frontage and generally be reflective of Edwardian, Queen Anne, Foursquare, Arts and Crafts, Prairie, Craftsman, Minimal Traditional and/or Ranch architectural styles.
8. Front Attached Garage shall only be accepted where there is no rear lane access. Where front Attached Garages are allowed, the dominance of the garage shall be reduced by having the façade of the garage flush with the front façade of the dwelling or recessed a minimum of 1.5 m behind the front façade of the dwelling. No front street access driveways, front street access parking pads, or front street access Detached Garages shall be permitted where there is vehicular access available from a rear lane or side street unless currently existing.
9. Upper storey living spaces, wholly or partially, should be incorporated within the roof structure for increased floor area. Dormer/end gable windows are encouraged to provide adequate light.
10. The height and total floor area of all accessory Buildings shall not exceed the footprint area or height of the principal Building. Accessory uses shall be subordinate in size and use to the principal Building.



Dominant Garage



Non Dominant Garage



End Gable Window

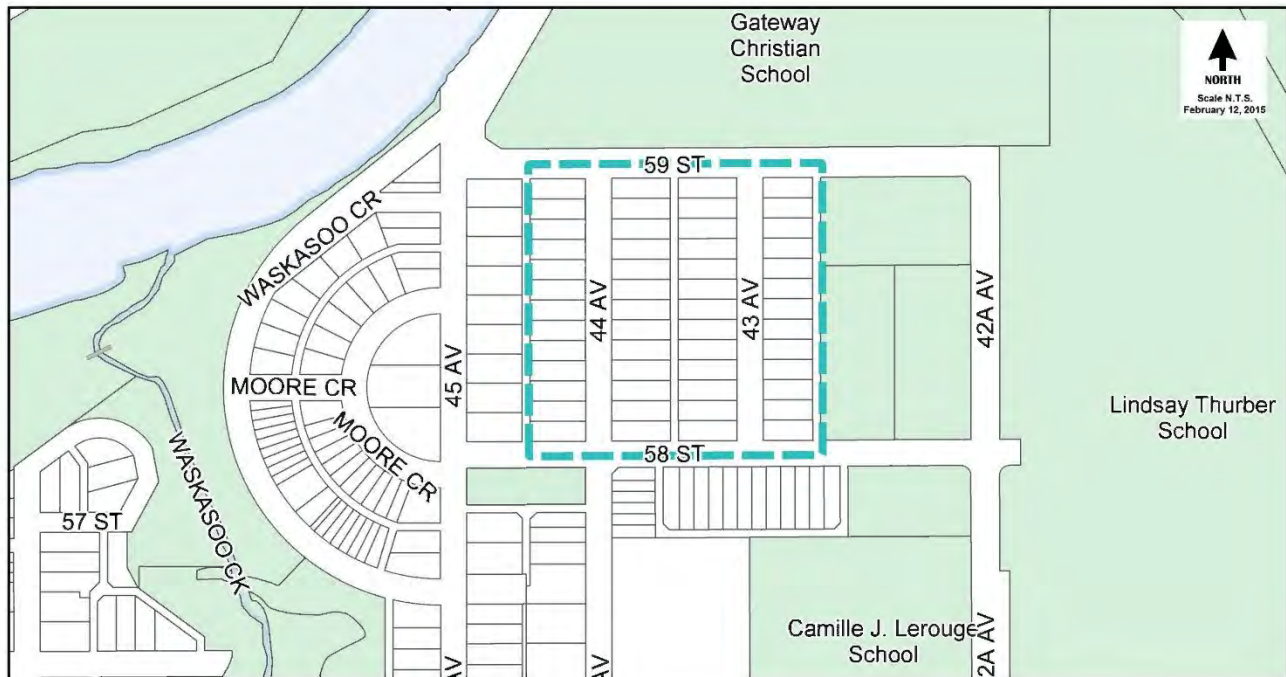


Julian Sharman Residence



4. Waskasoo A-20 Camp Character Statement

4.1 Character Statement Area Map



WASKASOO PLAN AREA A-20 CAMP CHARACTER AREA

4.2 Context and History

After WWII, the majority of the Department of Defence's land from the A-20 Army Camp was divided up for development. The City of Red Deer was experiencing a huge population boom and housing was needed for returning Veterans. The Federal Government began the pragmatic construction of Veteran Land Act (VLA) homes in 1945, lining these streets with modest dwellings. These dwellings remind us of the sacrifices made by the veterans of WWII and walking these streets gives the impression that creative expression, connection, nature, and community, seems to be valued over square footage.



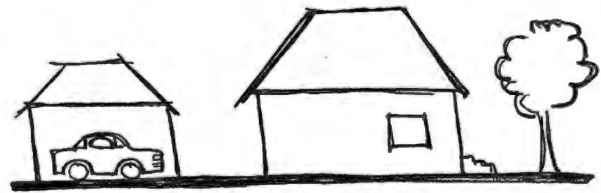
Separated sidewalks with tree lined streets

4.3 Common Forms and Scale of Buildings

- 1 or 1 ½ storey dwellings with flat, single dimension facades, and a central Prominent Entry.
- Buildings designed for efficiency, utilizing standard lengths of joists, and framing membranes.
- 1 ½ storey dwellings have simple steep pitched roofs, often with no overhang.
- The overall shape is very square or rectangular and compact, with few ornamental features.
- Large side yards, consistent Front Yard Setbacks ranging from 6 m to 8 m, and deep Rear Yards ranging from 38 m to 45.5 m. Lot widths are consistently between 15.5 m and 16 m.
- No vehicular access from the street. Detached garages are accessed from the rear lane, are out of sight, and don't affect the character when viewed from the street.
- Additions are common in the rear but there are many smaller side yard additions, and some have added Dormer windows.
- Most redevelopment has been built upon the existing dwelling or foundation, but each builder has come up with a style that compliments the area in its own way.
- Size of original homes was either 57 m² or 68 m² but additions and renovations have allowed up to approximately 130 m².
- Only replacement and renovated dwellings exceed 1 ½ storeys in height.
- Some dwellings have Cantilevered projections, Dormers and porch features.



Flat Single
Dimension Facade



Detached Garage



Typical unmodified dwelling



Typical dwelling form with modified porch, Dormer and side/rear addition.

4.4 Common Building Materials

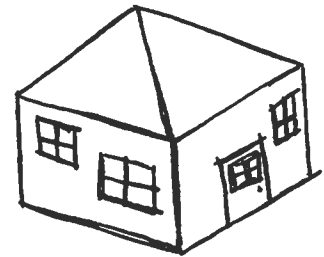
- Wood
- Stucco
- Horizontal or vertical vinyl siding
- Concrete or stone faced foundation
- Brick detailing

4.5 Other Common Elements

- Well connected sidewalks and pathways with streets laid out in a grid pattern
- Mature tree lined streets with separated sidewalks

4.6 Recommended Design Elements

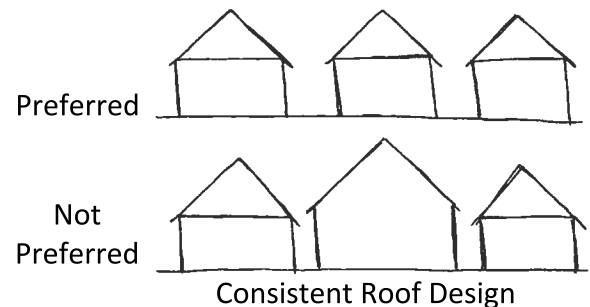
1. The simple, rectangular form and proportions of the original Post-War houses should form the basis for design inspiration as opposed to replication. A design showing efficiency in the use of materials, systems and technologies as well as reflecting some of the architectural pattern language of the Immediate Street Context is desirable.
2. Roof ridge and eave height as well as roof style, typically pyramid or peaked, should align with the Immediate Street Context. If there is inconsistency resulting from height differences, the proposed Building elevations should include architectural detailing, Building articulation and stepping back of the upper floor(s) to break up the larger Building form and reduce the impact to adjacent properties.



Pyramid Roof



Stepping Back Upper Floors



Consistent Roof Design

3. Dwellings should be 1 to 2 storeys in height. Dormers or similar design elements should be encouraged to provide some additional accommodation in the roof.
4. Building additions, greater than 30% of the floor area of the existing Building, shall be located in the rear and only additions 30% or less of the floor area of the existing Building, shall be located to the side.
5. The average of the adjacent Front Yard Setbacks, commonly deep Rear Yards and the typical appearance of large side yards when viewed from the street shall be required unless there are obvious anomalies that must be considered.
6. No front street access driveways, front street access parking pads or front street access garages where there is vehicular access available from a rear lane or side street shall be permitted.
7. Sensitive additions proposed to the front façade should be supported when the Front Yard Setback, Building design, siting and materials utilized are compatible with the Immediate Street Context. Each proposal will be assessed individually and will look at the proposed location in relation to the existing Building footprint, the immediately abutting existing Buildings foot prints, average of Setbacks in the Immediate Street Context, and impacts to existing features.
8. The height and total floor area of all accessory Buildings shall not exceed the footprint area or height of the principal Building. Accessory uses shall be subordinate in size and use to the principal Building.

5. Waskasoo Environmental Character Statement

5.1 Character Statement Area Map



WASKASOO PLAN AREA ENVIRONMENTAL CHARACTER AREA

5.2 Context and History

The Environmental Character Area is made up of the Kerry Wood Nature Centre, Gaetz Lakes Sanctuary, and an undeveloped lot located at 4240 – 59th Street directly east of the Gateway Christian School. These lands were originally part of Glenmere Farms and then a portion of these lands became the A-20 Army Camp during WWII.

The area north of 59th Street and east of 42A Avenue has a greater need for environmental protection and sensitive development due to a shared drainage catchment area uninterrupted by much infrastructure with the Gaetz Lakes Sanctuary, the Kerry Wood Nature Centre, and proximity to McKenzie Trails Recreation Area and the Red Deer River. The Gaetz Lakes Sanctuary is a Provincially regulated Bird Sanctuary, consequently, development within the Sanctuary is not anticipated.

The McKenzie Trails Recreation Area and the Future Urban Development Lots have a number of constraints associated with them including being in the flood plain, flood fringe, an escarpment area and a land fill setback area. As a result no further intensification through an increase in the number of dwelling units shall be permitted; these areas are not included in the Environmental Character Area.

5.3 Common Forms and Scale of Buildings

- Natural features including native vegetation, mature trees, and a minimal Building coverage.

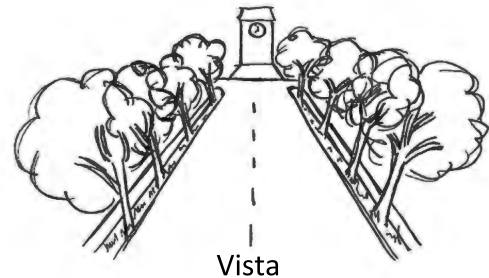
- Buildings are typically 1 storey with flat roof construction.
- Gravel or asphalt parking areas with native naturalized Landscaping.
- Two Heritage properties are located within this area; the Wishart Cabin Site within Gaetz Lakes Sanctuary, and the Allen Bungalow at Kerry Wood Nature Centre.
- The natural and recreational areas tend to have few, smaller structures and park furnishings.

5.4 Common Building Materials

- Wood and Stone

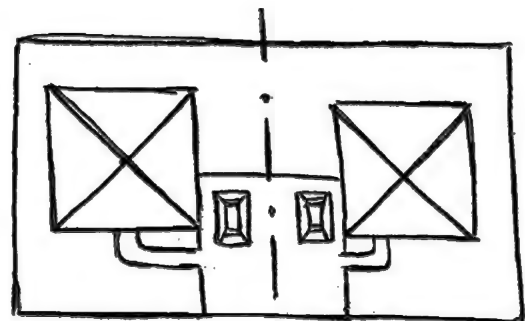
5.5 Other Common Elements

- Rural character with native, naturalized landscapes, rural road cross sections, a lack of fencing
- A wide open sense of space that is not common in other areas of the City



5.6 Recommended Design Elements

1. A conservation development pattern which clusters a development's built form together into a portion of the overall area allowing the open space of the development to contribute to the existing adjacent open space and be an amenity to the site users including wildlife. For Public Service uses with a residential component like Assisted Living, concepts such as Pocket Neighbourhoods may be considered.
2. Mature street character, scenic Vistas viewable from the road, and existing natural features of the area shall be maintained.
3. Buildings should be designed to include environmentally sustainable design features by incorporating the use of green technologies, Ecological Design, water conservation measures.
4. Low maintenance Landscaping with native non-invasive plant material shall be required and the incorporation of both Xeriscaping and Naturescaping is encouraged. The use of herbicides and pesticides is strongly discouraged.
5. Landscaped areas and islands throughout parking and storage areas shall be provided to intercept precipitation, reduce surface heating, provide canopy shading, and enhance the appearance.
6. Permeable and semi-permeable paving surfaces should be provided to improve ground water recharge and reduce storm water runoff.
7. A system to capture and recycle roof runoff and rainwater should be provided for landscape watering. If this system is proposed, the use of roofing materials that do not yield contaminants is recommended.
8. Adaptive reuse of existing Buildings and structures is encouraged.
9. All roads north of 59th Street within the character area should maintain their natural boundaries and native vegetation to preserve and enhance the wildlife corridor through this critical area adjacent to the Red Deer River.
10. Shared driveways are encouraged. Other reductions in impervious surfaces may be achieved through the elimination of curbing and the use of decorative pervious surfaces for sidewalks, driveways, and trails.



Shared Driveway

11. Disruption of any open space proposed to be disturbed during construction or otherwise not preserved in its natural state shall be shown on development plans and shall be restored with vegetation that is compatible with the natural characteristics of the site.
12. Excavated material may be used for the creation of berms or to provide a low fertility soil for the creation of wild flower meadows or similar semi-natural habitats to blend with the more naturalized character of the area.
13. Existing specimen conifer and deciduous trees shall be identified on a site plan and protected during site construction activities and after by ensuring Buildings, services or Hard Surface areas are not sited too close.
14. New trees planted should be of a similar species than what is currently found in the Waskasoo Environmental Character Area. Edible vegetation such as fruit trees and berry bushes should be included in Landscaping.
15. New development should not adversely affect the character of the streetscape, as a result of being sited too close to the road, of inappropriate or excessive Massing, form or height having a negative impact on abutting properties in terms of shadows and privacy/over look, or causing the loss of landscape features or other factors which may have a negative effect on the streetscape or abutting properties.
16. Location, style, and amount of fencing proposed around and/or adjacent to open space areas shall have consideration for the movement of wildlife and the prevention of opportunities for wildlife entrapment.
17. In order to reduce ambient light levels which will reduce the impact of light on nocturnal environments, exterior lighting on Buildings or within yards should be pointed down particularly near the Sanctuary.



Existing road cross section on 45th Avenue north of 59th Street

6. Definitions

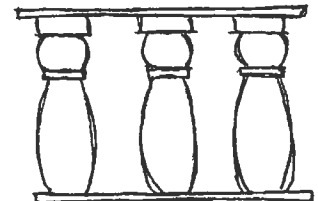
Arts and Crafts Style developed in the 1860s as a reaction against the growing industrialization of Victorian Britain. Those involved believed in the equality of all the arts and the importance and pleasure of work. The appearance of the style resulted from the principals involved in the making of the objects. By the end of the century such ideals had affected the design and manufacture of all the decorative arts in Britain. The principle characteristics are:

- Truth to materials; meaning preserving and emphasizing the natural qualities of the materials used to make objects was one of the most important principles of Arts and Crafts style
- Simple forms; where there was no extravagant or superfluous decoration and the actual construction of the object was often exposed
- Natural motifs as Nature was an important source of Arts and Crafts motifs as the patterns used were inspired by the flora and fauna of the countryside
- The vernacular - The vernacular, or domestic, traditions of the British countryside provided the main inspiration for the Arts and Crafts Movement.

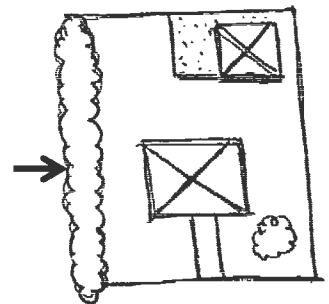
Attached Garages are enclosed parking areas which are integrated into the main dwelling structure and are typically accessed from a driveway connecting to a municipal street or rear lane.



Attached Garage



Balustrade



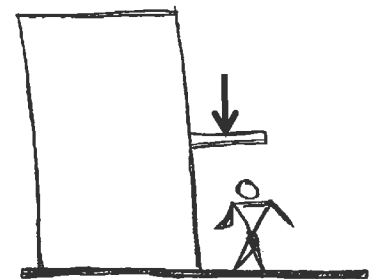
Boundary Hedge

Balustrade, also called spindle or stair stick, is a molded shaft, square or lathe-turned form, a form cut from a rectangular or square plank, various forms, made of stone or wood and sometimes of metal, standing on a unifying footing, and supporting the coping of a parapet or the handrail of a staircase.

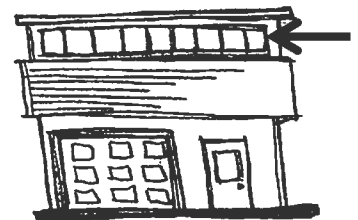
Building means any structure used or intended for supporting or sheltering any use or occupancy.

Boundary Hedge is vegetation in the form of hedges or shrubs located on or adjacent to the registered property line of a site.

Building Materials are materials used for construction. For the purpose of this document, building materials predominantly refer to exterior cladding materials, such as brick, stone, and wood.



Cantilever



Clerestory

Cantilever is a beam anchored at only one end. The beam carries the load to the support. Cantilever construction allows for overhanging structures without external bracing. This is in contrast to a simply supported beam which is supported at both ends.

Clerestory is a high wall with a band of narrow windows along the very top. The clerestory wall usually rises above adjoining roofs.

Common Form is a similarity in the shape, outline or configuration of a structure as apart from colour, materials, etc.

Common Materials is a similarity in the substance, or a mixture of substances that constitute a thing.

Common Scale is a similarity in size based on an informal system of general size categorizations useful for comparison purposes.

Cornice is generally any horizontal decorative molding that crowns a building or furniture element— the cornice over a door or window, for instance, or the cornice around the top edge of a pedestal or along the top of an interior wall. A simple cornice may be formed just with a crown molding. The function of the projecting cornice of a building is to throw rainwater free of the building's walls.

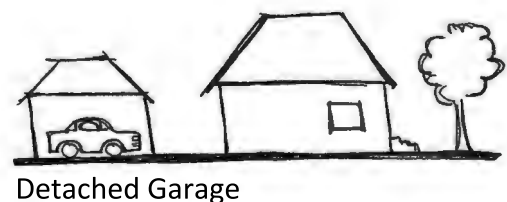
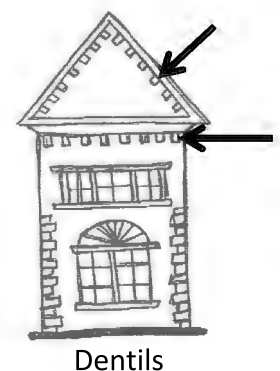
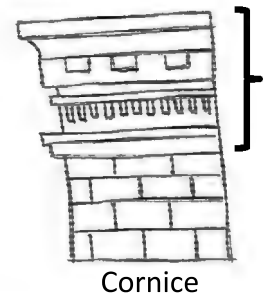
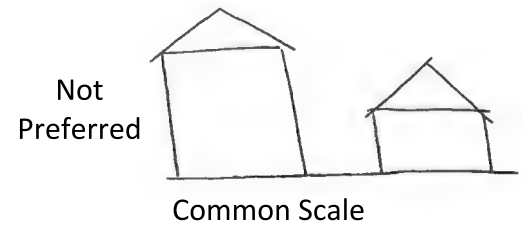
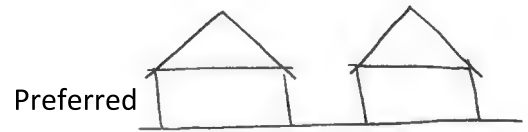
Craftsman Style is based on a reform philosophy, encouraging originality, simplicity of form, local natural materials, and the visibility of handcraft, but distinguished itself, particularly in the Craftsman Bungalow style, with a goal of ennobling modest homes for a rapidly expanding American middle class.

Dentil is a small block used as a repeating ornament under the projecting part of a cornice. As a general rule the projection of the dentil is equal to its width, and the intervals between to half the width.

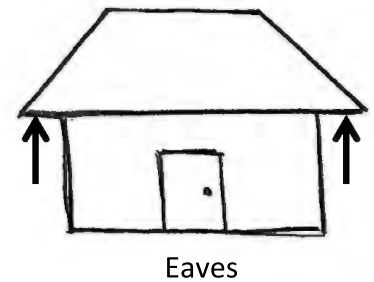
Detached Garages and Accessory Structures are free-standing buildings that are not connected to the main dwelling, and are typically accessed from a driveway connecting to a municipal street or rear lane, but which contribute to the overall site function and layout.

Dormer is framing which projects from a sloping roof, providing an internal recess in the roof space.

Dormer Window is a window in a dormer for lighting a room adjoining a sloping roof.



Eaves are defined as the edges of the roof which overhang the face of a wall and, normally, project beyond the side of a building. The eaves form an overhang to throw water clear of the walls and may be highly decorated as part of an architectural style.



Ecological Design is defined as any form of design that minimizes environmentally destructive impacts by integrating itself with living processes. Ecological design is an integrative ecologically responsible design discipline.

Edwardian Style is the style popular during King Edward VII of the United Kingdom's reign; he reigned from 1901 to 1910, but the architecture style is generally considered to be indicative of the years 1901 to 1914. Edwardian architecture is:

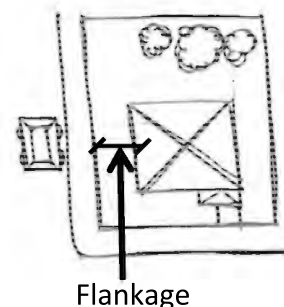
- generally less ornate than high or late Victorian architecture
- Lighter colours were used;
- the use of gas and later electric lights caused designers to be less concerned about the need to disguise soot buildup on walls compared to Victorian era architecture.
- Decorative patterns were less complex and there was less clutter than in the Victorian era.
- Ornaments were perhaps grouped rather than everywhere.
- false front facades and carefully crafted columns and cornices.



Flankage is the side yard abutting a street on a corner lot.

Foursquare Style is an American house style popular from the mid-1890s to the late 1930s. This style incorporates elements of the Prairie School and the Craftsman styles. It is also sometimes called Transitional Period. It was a reaction to the ornate and mass-produced elements of the Victorian and other Revival styles popular throughout the last half of the 19th century. Foursquare style usually has these features:

- plain, often incorporating handcrafted "honest" woodwork (unless purchased from a mail-order catalog)
- Simple box shape
- Two-and-a-half stories high
- Four-room floor plan
- Low-hipped roof with deep overhang
- Large central dormer
- Full-width porch with wide stairs
- Brick, stone, stucco, concrete block, or wood siding



Front Façade refers to the front elevation of the dwelling which faces the street and contains the main entrance.

Front Yard means that part of a site which extends across the full width of a site between the front boundary and the nearest wall or supporting member of a building.

Gable is the upper triangular-shaped portion of the end wall of a building.

Green Building (also known as **green construction** or **sustainable building**) refers to a structure and using process that is environmentally responsible and resource-efficient throughout a building's life-cycle: from siting to design, construction, operation, maintenance, renovation, and demolition. In other words, green building design involves finding the balance between homebuilding and the sustainable environment. This requires close cooperation of the design team, the architects, the engineers, and the client at all project stages. The Green Building practice expands and complements the classical building design concerns of economy, utility, durability, and comfort.

Green Roof means a building's roof which allows vegetation to grow in a growing medium. The green roof may be partially or completely covered in plants.

Hard Surface is an area which is paved or covered with a permanent, durable material to make a suitable surface for vehicular and pedestrian activities. In the context of this guideline, hard surface refers to driveway and walkway surface treatments, predominantly within the front yard of the property.

Hip roof or **hipped roof** is a type of roof where all sides slope downwards to the walls, usually with a fairly gentle slope. Thus it is a house with no gables or other vertical sides to the roof. A square hip roof is shaped like a pyramid. Hip roofs on houses could have two triangular sides and two trapezoidal ones. A hip roof on a rectangular plan has four faces. They are almost always at the same pitch or slope, which makes them symmetrical about the centerlines. Hip roofs have a consistent level fascia, meaning that a gutter can be fitted all around. Hip roofs often have dormer slanted sides.

Immediate Street Context refers to existing buildings along the same street frontage (both sides of the streets) as the proposed redevelopment and within the same block.

Landscaping refers to any activity that modifies the visible features of an area of land, including simple to complex arrangements of living elements (flora), natural elements (landforms), and human elements (structures).

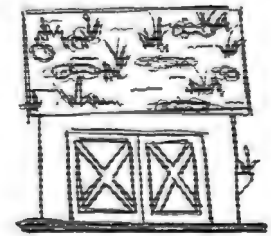
Massing is defined as the three dimensional form of a building.

Minimal Traditional Style is housing of simple design appropriate for a country recovering from a Great Depression and anticipating World War II. Minimal Traditional houses may have these features:

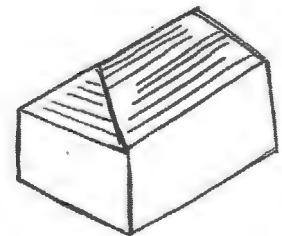
- small with minimal decorations
- low or moderately pitched roof
- minimal eaves and roof overhang



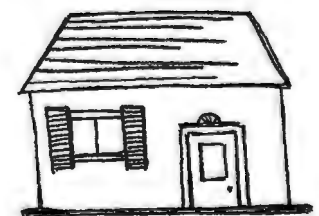
Gable



Green Roof



Hip Roof

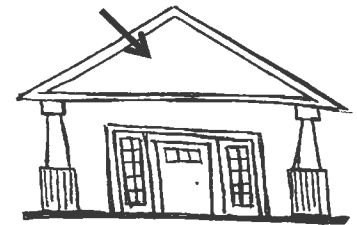


Minimal Traditional Style

- side gable, often with one front-facing cross gable
- front door entrance under the front cross gable
- one story, with an attic story
- shutters are common
- exterior siding of wood, brick, or a mix of sidings
- small fireplace and chimney

Naturescaping means the modification and enhancement of a lot or development to promote water efficiency and reduce the dependence on fertilizers and pesticides. The use of native central Alberta non-invasive vegetation is preferred.

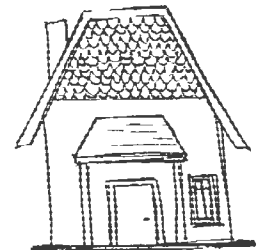
Pediment is an element in classical, neoclassical and baroque architecture, and consists of a gable, originally of a triangular shape, placed above the horizontal structure of the entablature, typically supported by columns. The triangular area within the pediment was often decorated with relief sculpture depicting scenes from Greek and Roman mythology or allegorical figures.



Pediment

Prairie Style is a late 19th- and early 20th-century architectural style. The style is usually marked by horizontal lines, flat or hipped roofs with broad overhanging eaves, windows grouped in horizontal bands, integration with the landscape, solid construction, craftsmanship, and discipline in the use of ornament. Horizontal lines were thought to evoke and relate to the native prairie landscape. The designation Prairie is due to the dominant horizontality of the majority of Prairie style buildings which echo the wide, flat, treeless expanses of the mid-West. The most famous proponent of the style, Frank Lloyd Wright, promoted an idea of "organic architecture", the primary tenet of which was that a structure should look as if it naturally grew from the site. Prairie style houses may have these features:

- Low-pitched or flat roof
- Overhanging eaves
- Horizontal lines
- Central chimney
- Open floor plan
- Clerestory windows



Prominent Entry

Prominent Entry is a building entrance that is conspicuous in its position or importance and is supported by architectural detailing, a walkway to the street and appropriate landscape treatment.

Queen Anne Style is a style that came into vogue in the 1880's and was used until the 1920's. Distinctive features of the American Queen Anne style (rooted in the English style) may include:

- an asymmetrical facade;
- dominant front-facing gable, often cantilevered out beyond the plane of the wall below;
- overhanging eaves; shaped gables;
- round, square, or polygonal tower(s);
- a porch covering part or all of the front facade, including the primary entrance area;
- a second-story porch or balconies;
- pedimented porches;

- differing wall textures, such as patterned wood shingles shaped into varying designs, including resembling fish scales, terra cotta tiles, relief panels, or wooden shingles over brickwork, etc.;
- dentils; Spindle work;
- classical columns;
- oriel and bay windows;
- horizontal bands of leaded windows;
- monumental chimneys;
- painted balustrades;
- wooden or slate steep roofs
- Front gardens often had wooden fences

Ranch Style is a domestic architectural style originating in the United States. The ranch house is noted for its long, close-to-the-ground profile, and minimal use of exterior and interior decoration. The houses fuse modernist ideas and styles with notions of the American Western period working ranches to create a very informal and casual living style. Ranch Style houses have many of these features:

- Single story, rectangular, L-shaped, or U-shaped design
- Low pitched gable roof, deep-set eaves
- Horizontal, rambling layout: Long, narrow, and low to the ground
- Large windows: double-hung, sliding, and picture
- Sliding glass doors leading out to patio
- Attached garage
- Simple floor plans with an emphasis on openness (few interior walls) and efficient use of space
- Built from natural materials: Oak floors, wood or brick exterior
- Lack decorative detailing, aside from decorative shutters



Ranch Style

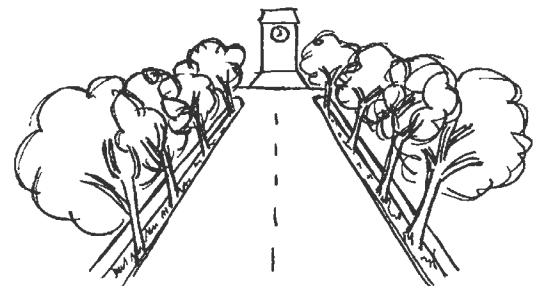
Rear Yard means that part of a site which extends across the full width of a site between the rear boundary and the nearest wall or supporting member of a principal building.

Scale is defined as the size of a building and its component parts in comparison with the size of neighbouring dwellings.

Setback is defined as the distance of a structure from a property line.

Vista means a scenic or panoramic view.

Xeriscaping means a method of landscaping that uses plants that can survive dry periods on their own without reliance on watering, fertilizer or other maintenance.



Vista



ARP Appendix 2

Waskasoo Historic Sites

The City of Red Deer has two levels of designation in *The City of Red Deer's Land Use Bylaw 3357/2006*. Historical Significance (HS) is the most common and the lowest level of protection and it is a local designation listed in *The City of Red Deer's Land Use Bylaw* as HS- Historical Significance. Municipal Designation (HP) is a higher level of designation. *The Alberta Historical Resources Act* gives City Council the authority to designate sites as Municipal Historic Resources. This is the highest level of local designation offering a higher level of protection. Examples of such sites include the Michener Administration Building, Cronquist House, and Parsons House. These sites are listed in *The City of Red Deer's Land Use Bylaw* as HP-Historical Preservation sites. Waskasoo has 17.12% of all the currently listed Historic Sites and the potential for more.

There are, as of October 1, 2015, a total of nineteen historical sites which include four Historical Preservation sites and fifteen Historical Significance sites in the Waskasoo neighbourhood. The historical designation given to these sites by *The City of Red Deer Land Use Bylaw 3357/2006* is intended to promote community awareness and provide a means whereby these sites or buildings are preserved. The designation also protects some of these sites and buildings from demolition until further evaluation can prove otherwise. The Bylaw encourages but does not require that any renovations undertaken be sympathetic to the historical integrity of the site. For future reference, the *Land Use Bylaw* should be used to verify the current list of designated properties. The nineteen sites are listed in Figure 1 below and their locations shown in Figure 2.

Figure 1 - Historical Preservation and Historical Significance Sites in Waskasoo (Excerpt from LUB)

Property Number	Historical Site Designation Building	Street Address	Legal Description	Designation	SOS/ Integrity
HP - 4	Allen Bungalow	6316 - 45 Avenue	NE 1/4 21-38-27-4 which lies east of Road Plan 1264 ET	Municipal/ Registered	Statement of Significance
HP - 12	Clarke Residence	4757 - 56 Street	Lot 27, Block A, Plan K1	Municipal	SOS
HP - 15	Scott House	4743 - 56 Street	Lot 20, Block A, Plan K1	Municipal	SOS
HP-18	Routledge Family Residence	4736 56 Street	Lot 15, Block C, Plan 5947 AM	Municipal	SOS



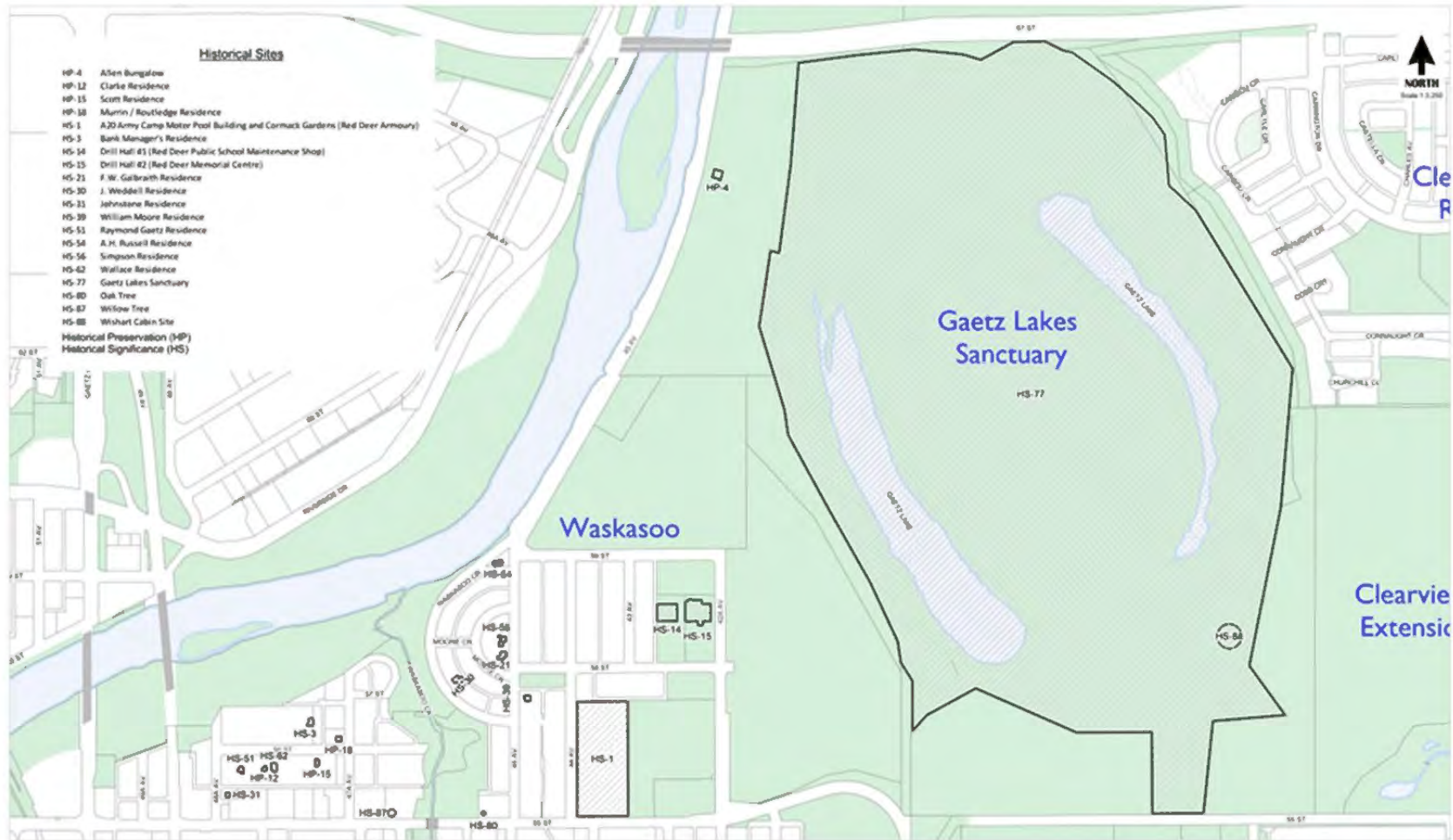
HS-1	A20 Army Camp Motor Pool Building & Cormack Gardens Currently Red Deer Armoury	4402 - 55 Street	Parcel C, Plan 837 H.W.	N/A	SOS
HS-3	Bank Manager's Residence	4742 - 56 Street	Lot 12, Block C, Plan K1	N/A	SOS
HS-14	Drill Hall #1 (Red Deer Public School Maintenance Shop)	4230 - 58 Street	Lot D1, Plan 4154 R.S.	N/A	
HS-15	Drill Hall #2 (Red Deer Memorial Centre)	4214 - 58 Street	Lot E, Plan 3962 H.W.	N/A	
HS-21	F.W. Galbraith Residence	5810 - 45 Avenue	Lot 1, Block 5, Plan 961 H.W.	N/A	SOS
HS-30	J. Weddell Residence	4532 Waskasoo Crescent	Lot 40, Block 2, Plan 872 2544	N/A	
HS-31	Johnstone Residence	5509 - 48A Avenue	Lot B, Block A, Plan 1995 ET	N/A	
HS-39	William Moore Residence	5555 - 45 Avenue	Lot 8, Block A, Plan 955 M.C.	N/A	SOS
HS-51	Raymond Gaetz Residence	4763 - 56 Street	Lot 30, Block A, Plan 647 K.S.	N/A	SOS
HS-54	A.H. Russell Residence	5938 - 45 Avenue	Lot 1 & 2, Block 3, Plan 1292 A.O.	N/A	SOS
HS-56	Simpson Residence	5820 - 45 Avenue	Lot 2, Block 5, Plan, 961 H.W.	N/A	SOS
HS-62	Wallace Residence	4755 - 56 Street	Lots 25-26, Block A, Plan K1	N/A	SOS
HS-80	Oak Tree	55 Street/46 Avenue	Lot 25, Block 1, Plan 1292 A.O.	N/A	
HS-87	Willow Tree	4700 -55th Street	Lots 5 - 7, Block B, Plan K1 Lot 21, Block B, Plan 902, 1952 Plan	N/A	
HS-88	Wishart Cabin Site	Gaetz Lake Sanctuary		N/A	

ARP APPENDICES





Figure 2 – Waskasoo Heritage Resources Map

WASKASOO
HERITAGE RESOURCES



RP Appendi 3

Missing L nk Ident f ed

Community consultation identified a number of locations within the community where there are missing sidewalk or trail connections. The City's 2015 Capital Sidewalk Program has included these sidewalk locations and will proceed to installation as budgets permit.

For potential trail connections, community consultation should be undertaken during the planning and investigation stages. Funding sources would also have to be identified. The potential locations for trail connections are shown on the map and described as follows:

- 47A Avenue north to the South Bank Trail: This potential location will need further investigation due to the impacts resulting from grade changes that would have to be accommodated to meet existing trail standards. Community consultation should be undertaken during the planning and investigation stages.
- 42A Avenue east to the trail that runs north/south behind Lindsay Thurber and goes up Michener Hill along the existing worn desire line: This potential location will need further investigation due to the need for an agreement with the Red Deer Public School Board to build the trail through their property.
- East along the south bank of Red Deer River from Waskasoo Creek: This potential location for a shale pathway will need further investigation due to the potential of further impact on the riparian area. The placement of a garbage receptacle at the entry may alleviate some of the concerns as this location is currently being used by people fishing and dogs swimming informally.

The Traffic Section will be improving pedestrian connectivity by adding to the existing cross walks in the neighbourhood. Approximately 10 new cross walks will be added in the near future. Refer to the Missing Links map for proposed locations. Additional signage including 'Local Access Only' signs on some lanes and a 'No Parking Anytime' sign in the McKenzie Lakes subdivision.

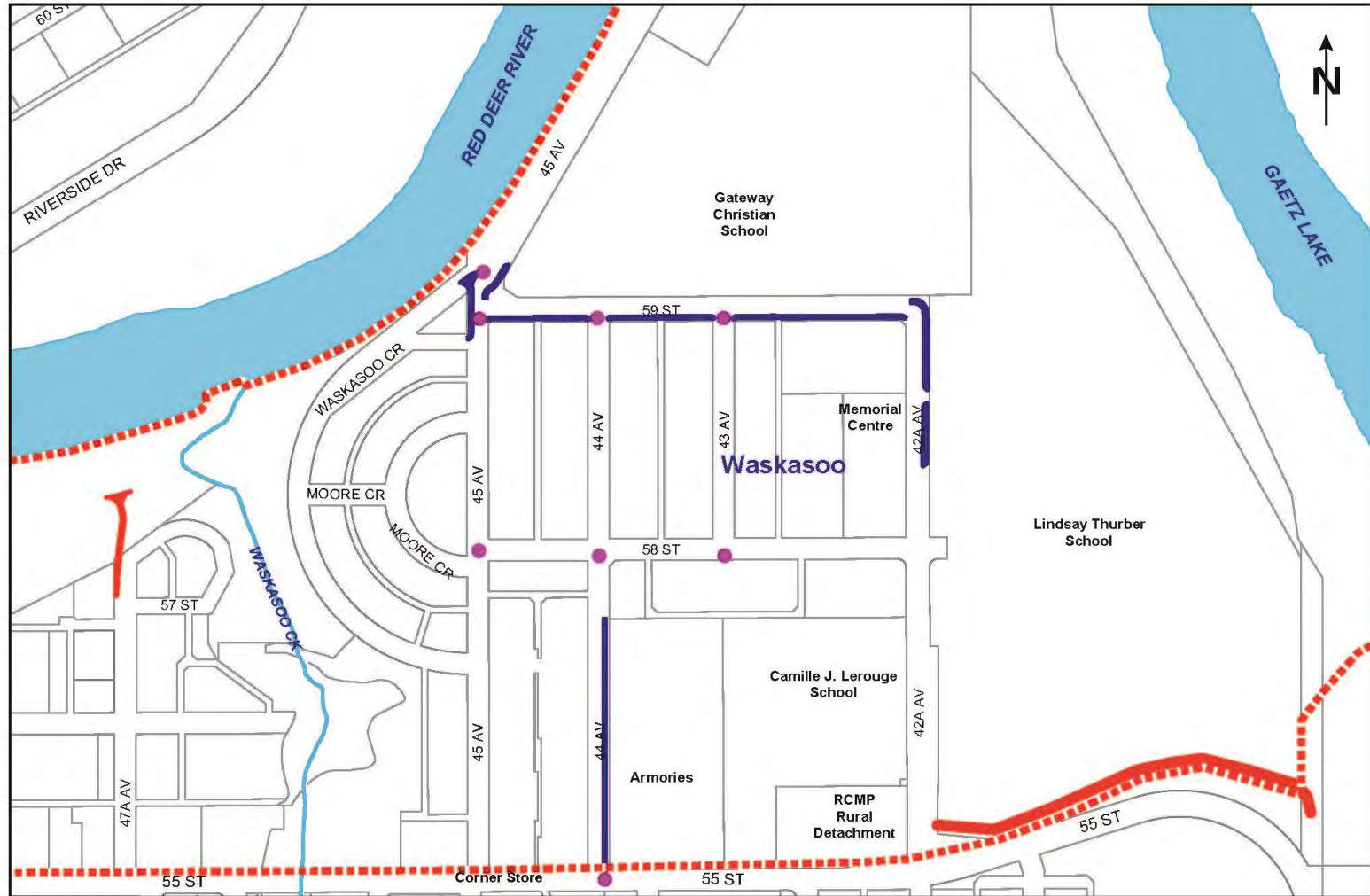
Vehicular

A vehicular access to 67 Street was also identified as an opportunity to provide a second option for entering or exiting the community. Due to the large number of constraints in the area as well as the substantial change in grade that would have to be accommodated, this option was determined to not be feasible.



ARP APPENDICES

Figure 1 – Movement – Missing Links



Missing Links

- Plan Boundary
- Potential Trail Connection
- Missing Sidewalk Connection
- Potential Crosswalk



From: [REDACTED]
To: [Appeals](#)
Subject: [External] Appeal number #SDAB 0262 006 2025
Date: January 20, 2026 11:55:40 AM
Attachments: [better visual.png](#)

You don't often get email from [REDACTED]. [Learn why this is important](#)

Subject: Suggested Modifications – Appeal #SDAB 0262 006 2025

Dear [Committee](#),

I would like to respectfully propose a set of modifications to the current project under Appeal #SDAB 0262 006 2025, which I believe would significantly improve its integration with the surrounding neighbourhood.

My suggestion is to adjust the building orientation so that the three-storey portion is positioned closer to 45 Avenue, with a gradual height transition toward 59 Street—two storeys in the middle section, and a single storey along 59 Street. This stepped approach would greatly reduce the visual impact on 59 Street, where the current height is disproportionate for the area.

I also recommend relocating the parking entrance to 59 Street. There is sufficient space for a standard two-metre driveway, and this location would avoid any obstruction to buses waiting on adjacent streets. Additionally, enhancing the parking area with more vegetation—shrubs, trees, and green buffers—would improve both aesthetics and neighbourhood acceptance.

These adjustments would make the project far more compatible with its surroundings and would likely lead to strong community support. With these changes, it could become a very positive and well-received development.

Thank you for considering these recommendations.

Kind regards,

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Subject: [External] #SDAB 0262 006 2025
Date: December 22, 2025 10:57:52 AM

You don't often get email from [REDACTED] [Learn why this is important](#)

[REDACTED] — voici une **version plus formelle, plus professionnelle et mieux structurée**, adaptée à une lettre officielle municipale. J'ai conservé fidèlement ton message, mais avec un ton administratif clair et cohérent.

Appeal Number: SDBAB 0262006 2005

Hello,

Regarding this project, which is generally well-designed, it could be supported if a few simple modifications were considered.

1. Portion facing 59 Street:

The façade is too long. Reducing its length by approximately 50% would create a more balanced streetscape.

2. Building height:

The proposed height appears excessive. A two-storey structure would likely be sufficient, with the possibility of a three-storey section along 45 Avenue, beginning at the midpoint of the building's length.

A larger patio area with bordering trees, and/or rear parking accessed from 59 Street, would allow for additional units facing 45 Avenue while improving the overall layout.

In summary, for improved visual integration and neighbourhood acceptance:

- Reduce the height;
- Shorten the 59 Street frontage by half;
- Place the main entrance and interior tree-lined parking along 59 Street.

This would result in a smaller but still profitable project for the developer, while being more harmonious with the surrounding area.

Thank you for considering these suggestions.

Si tu veux, je peux aussi préparer une **version bilingue (FR/EN)** ou une version encore plus formelle selon les normes municipales.

[REDACTED]

CANADA



Email tracked with Mailsuite · [Opt out](#)

From: [REDACTED]
Cc: [Appeals](mailto:Appeals@waskasoo.info)
Subject: secretary@waskasoo.info
Date: [External] #SDAB 0262 006 2025
January 22, 2026 4:22:18 PM
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)

You don't often get email from [REDACTED]. [Learn why this is important.](#)

Dear Subdivision Development Appeal Board,

Re: #SDAB 0262 006 2025

We are writing to express our concerns regarding the development permit application for a seniors' supported living apartment building at 4240-59 Street.

We are residents of Waskasoo. Although our home is not adjacent to the development on the 59th Street property, it has the potential to affect our enjoyment of the area and we are very empathetic to our neighbours with greater adjacency to the lot. We are not against reasonable, sensitive, and high-quality development of this parcel of land, but we believe that the design as submitted does not meet these standards. We have some significant concerns about the design of the building, the placement of the lot and site utilization, its impact to the streetscape, and the potential for further densification of the parcel in the future.

The building design does not conform to the character statements of the Waskasoo ARP. It is a typical three-story apartment building design duplicated time and again across North American cities with no sense of place and little attention to beauty or detail. It aspires to the same design quality and standards we have seen many times in this city, most notably the 1970s development of apartment buildings on 55th Street. I have lived in Red Deer long enough to know that this is not considered one of our finest moments in planning and development. Development like this is one of the reasons that the Waskasoo ARP was implemented: to ensure the integrity of the area's cultural, natural and architectural character.

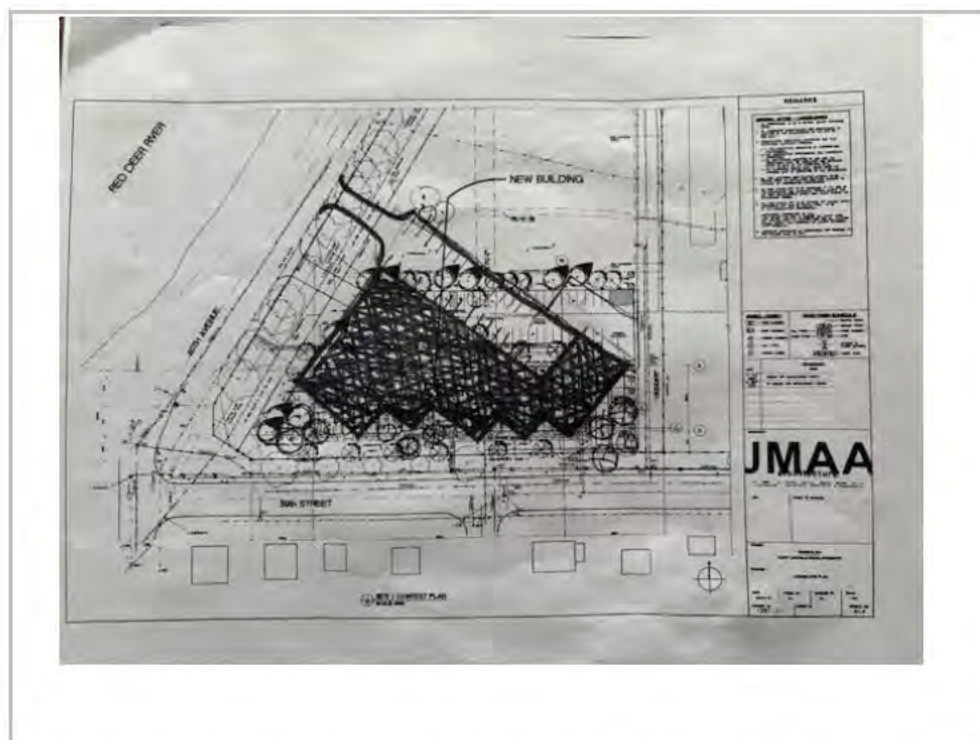
We believe that this parcel of land offers unique and substantial opportunities to create a high-quality environmentally and architecturally sensitive seniors' residence. Here is an example from Qualicum Beach, B.C.:





When we saw Qualicum Manor a few years ago we were struck by its elegant interpretation of the Craftsman Style. Some like this would look amazing on the 59th Street parcel, but other opportunities abound. The building could demonstrate a more contemporary approach that mimics the scale and form of the neighbourhood, one that respects and honours the residential and historic character of the neighbourhood without a strictly traditional approach.

Regarding the massing of the building and the placement on the site, we feel the developer has made little effort to address the concerns of the neighbouring residents regarding the obstruction of views and negative impact to the street's character. The block-like massing and facing the rear of the building to the street is not neighbourly, nor does it meet the requirements of the Waskasoo ARP. The massing could have more variety, with setbacks and various roof heights. We do not have full information on the site constraints for siting the building, but we strongly believe that a more imaginative, interesting, sensitive, and respectful approach could be taken. Perhaps the building could be sited at an angle to facilitate a stepped façade and greater landscaping opportunities. This would also create better vistas for the homes on the south side of 59th Street as well as for the residents of the apartment building. While not significantly addressing the loss of the current residents' views towards the river, it would provide a friendlier and more attractive streetscape. To illustrate this suggestion, we have included a sketch overlayed on the developer's site plan:



An approach like this may occupy slightly more land to the north of the property, but a small concession to create a better site usage solution. Ideally, the building would be placed with an even larger setback from 59th Street. This should not be an issue unless additional future development is planned. We understand that this is currently not on the table, but it would be informative to ask the developer if this is being considered. No doubt that there will be continued strong opposition to this, especially if more of the same is presented.

To conclude, we believe the current design and site layout has room for improvement. While it likely checks the boxes on for an economical build and maximum potential for further lot development, we see it as a missed opportunity to truly take advantage of the incredible lot, the charm and beauty of the area, and the potential for this to be an asset to the neighbourhood (Or in other words, a good neighbour.)

This development would most definitely impact our enjoyment of our beautiful neighbourhood. It is not an attractive building. It does not utilize the site to its best advantage. It does not meet the requirements of the ARP. Other cities and towns have much higher standards for architectural integrity and beauty. The Town of Canmore comes to mind. All new developments require high degree of architectural quality, reflected in the design, materials, and site usage. We think it would be wonderful if the City of Red Deer took a similar approach.

Thank you for the opportunity to provide input to this very important decision.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Subject: [External] Appeal number SDAB 0262 006 2025
Date: January 27, 2026 9:34:59 AM

You don't often get email from a [REDACTED] [Learn why this is important](#)

Good morning,

I am writing to appeal the build of the 3 story 48 unit senior apartment building along 59st.

I am a Gateway School parent and I am concerned this large of a building imposes greater increase risk of my children and all the children attending Gateways safety getting to and from school. The additional traffic and roads this building would add increases the risk in an already VERY congested area with 3 schools in such a small mature residential area.

This is also a major health risk to the seniors you plan on housing. With that many seniors in this already congested area, that come with increased medial needs, if there was ever a medical emergency at the drop-off or pick up hours of school this could significantly delay the medical services that could have detrimental results.

It also increases the safety risk of the privacy of all the children that will be at the school and at the park. Not to mention the large building intruding on the privacy of all the residency. How are you going to manage and screen the residence to ensure they are not imposing any risk to the hundreds of children that attend Gateway.

Lastly, Waskasoo is such a peaceful neighbourhood offering, mature trees, green spaces, walking trails that connect the river trails, Kerrywood Nature Center and McKenzie Trails for all residence of Red Deer to enjoy. It also offers a great place for local wildlife within our beautiful city. A 3-story apartment building does not fit the design or feel the city has created here. This building would feel very intrusive on the mature area and block the views that are enjoyed by so many.

In closing, I respectfully request that the City reconsider the approval of this proposed development or explore alternative locations and designs that better align with the safety, health, and character of this neighbourhood. The scale and density of this project present serious concerns for school-aged children, seniors, and nearby residents, and do not reflect the intent of this mature, low-density, community-focused area. I urge decision-makers to prioritize safety, accessibility, and neighbourhood compatibility when evaluating this proposal.

From: [REDACTED]
To: [Appeals](#)
Cc: [REDACTED]
Subject: [External] appeal #SDAB 0262 006 2025 - Red Deer Subdivision and Development Appeal Board
Date: January 27, 2026 3:27:08 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

Hello Everyone, thank-you for your time, I'll be as concise & as brief as I can.

My family strongly opposes the permit application that East Lincoln Properties Corporation has submitted for their lot at 4240 59 street.

This email is about their filing to appeal the development permit. Please continue to deny the development permit.

We will not support any changes to this site location until East Lincoln Properties Corporation either have a plan for something that will be environmental/community-centric, or they consider our neighbourhood development plan that has been in place for twenty or so years. Their application is for a 3-storey, 48-unit seniors supportive living apartment building located along 59 street is not suitable for our neighbourhood.

We are not in favour of this development permit for that proposed commercial facility along this parcel of land for several reasons. The adverse effects to the existing neighbourhood (through increased traffic), the damage to the natural river habitat, our existing community enjoyment & the total non-conformity/disregard to the area's neighbourhood development plan. Our Waskasoo Community Association spent a great deal of thought & planning on guidelines to keep our neighbourhood in the beautiful state that it is ... everyone who owns a place in the area follows our Waskasoo Area Redevelopment Plan ... except East Lincoln Properties Corporation. They feel it is their right to barge into our community & change everything.

This area simply cannot support all the commercial involvement in creating a supportive living environment. My family believes that this sort of venture is better suited for elsewhere & that should this application be approved, the entire area will be adversely affected. There are so many other places that can support East Lincoln Properties Corporation's proposal. Somewhere with adequate bus service, somewhere with traffic & parking availability; if this proposed building is going to hold an approximate 48 suites you can be at least half of these people will have some sort of vehicle. There is no way that our neighbourhood roads can support 24 more cars moving in & out of the area. All our roads are only single lane & there is homeowner (or rental) residential parking on each side. There is no room for more. I know their proposal includes considerations for their own parking but what about their guests, their assisted living employees (probably around 6 employees per day) along with all sorts of service vehicles? Where will they park? If this even goes through – the amount of construction vehicles necessary will create extreme traffic for at least a whole year. It is quite likely that the residential roads will not even survive the construction phase. Is the city prepared to handle

the costs with road replacement & as taxpayers in the area, is this what we must look forward to? Will this include their need for sewer & water utilities? How much more will that cost us? How about their garbage? Great, more big truck traffic ...

Furthermore, this is a business that East Lincoln Properties Corporation wants to build. We are residential. There is no way to guarantee that they will keep this property as a “seniors supportive living” commercial venture or whether they will sell the property to another party, it is all just a not good idea.

This development will also overburden the riverbank & adjacent green space – I cannot stress enough how much this area supports the natural environment. The amount of construction traffic & noise this venture would cause will undoubtedly affect the habitat & nesting area in that thin band of riverbank that exists along the river. Dozens of dozens of deer & small mammals need this area to move through the city, they count on both sides of the river. If animals get caught out of this “transition area” they are likely to experience great stress & or die. Other professionals like the Nature Centre experts can speak to this & we wholeheartedly agree with their recommendations.

My family has been very committed – we have been writing emails & letters, attending meetings, doing as much as we can for YEARS about this. It is very frustrating how much time we spend on this & also that of our neighbours. In all seriousness – these sorts of supportive living buildings belong in the downtown core. Where the residents will have access to the core city services, leaving the established neighbourhoods & their neighbourhood associations to take care of development and other infrastructure changes. People moved to this Waskasoo neighbourhood because of how it is, not what it can become. East Lincoln Properties Corporation is not concerned with keeping a relationship as they deal in properties – they are in it for money & business, if they really cared one bit about our neighbourhood, they would reconsider their own plans & accommodate ours, they would consider the environment of the area. But they don’t & won’t & we don’t want them to be in our neighbourhood. Barging in & changing everything – it’s just rude. Do we really have no say in our neighbourhood’s future?

Please do not allow this land development to be reconsidered for East Lincoln Properties Corporation, please end it if possible. I agree with the stance taken by the Waskasoo Community Association, Red Deer Public School Board, Waskasoo Environmental Education Society, Gaetz Lakes Sanctuary Committee, and Red Deer River Naturalists.

Thank-you for your time,

[REDACTED]

[REDACTED]

Red Deer

From: [Development](#)
To: [Appeals](#)
Cc: [Jay Hallett](#)
Subject: Fw: [External] Subdivision & Development Appeal Board.
Date: January 27, 2026 1:15:15 PM

Good Afternoon,

Please see attached comment for Appeal SDAB 006 2025.

Thank you,

Jessie Johnson
Development Administrative Assistant
City of Red Deer Inspections & Licensing
(403) 342-8207 | Jessie.Johnson@reddeer.ca

From: [REDACTED]
Sent: Tuesday, January 27, 2026 9:32 AM
To: Development <Development@reddeer.ca>
Subject: [External] Subdivision & Development Appeal Board.

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January 27, 2026
Subdivision & Development Appeal Board
Attention: Lisa Nord, Board Clerk

Dear Lisa Nord and Members of the Board,

I am writing to you not only as a concerned father but also as an active member of our community to express my strong support for the proposed development currently under your consideration on appeal.

In our rapidly growing city, the reality of housing scarcity weighs heavily on many young families, including my own. The escalating costs of living have made it increasingly difficult for families to find affordable homes, and we are particularly alarmed by the shortage of options available for our senior population. The proposed development, which includes dedicated assisted living facilities, is a crucial step toward addressing this issue. It would enable families like mine to care for aging parents within close proximity, allowing them to maintain vital connections with their children and grandchildren while receiving the support they need.

Beyond the immediate social benefits, this project will bolster our local economy significantly. The construction phase alone will generate numerous job opportunities in various trades, from

carpentry to plumbing, providing livelihoods for skilled workers in our community. These jobs will have a cascading effect, contributing to a more robust local economy and strengthening the financial wellbeing of many working families in our area.

The vacant land earmarked for this development has been unused for far too long—an eyesore that detracts from our neighborhood’s potential. The proposal has garnered unanimous support from City Administration, indicative of its thoughtfulness and alignment with community needs. Approving this development would exemplify responsible urban planning and a proactive approach to enhancing the quality of life for our citizens.

In light of these considerations, I respectfully urge the Board to approve this development, recognizing the multifaceted benefits it brings to our community: accessible housing for families, essential support for our seniors, and meaningful job creation for our residents.

Thank you for your attention to this matter.

Sincerely,

A solid black rectangular box used to redact the signature of the sender.

From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.com
Subject: [External] SDAB 0262 006 2025
Date: January 19, 2026 6:35:33 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

Attention: Subdivision appeal board.

Because of its location along the Red Deer River, adjacent to the Waskasoo Park system and South Bank Trail, as well as near major nodes in the Red Deer park system, including the Gaetz Lakes Sanctuary, Kerry Wood Nature Centre, and McKenzie Trails, the proposed development at 4240 59 St stands to impact amenities shared by the entire city.

I submit the following concerns regarding this application:

1. Access to the parking area needlessly crosses the South Bank trail creating a hazard for trail users
2. The location of the building across the south end of the lot next to the 45th Ave lookout:
 - impinges on the already severely compromised wildlife corridor along the Red Deer River, and
 - will increase run off from concrete and asphalt surfaces into the Red Deer River and Waskasoo Creek watershed
3. The development will add traffic and congestion to 45th Avenue and the rural road access to McKenzie Lakes.

On top of these concerns, I would like to add that this development is far from most infrastructure that seniors require/enjoy. Most people in these facilities do not drive, making easy access to shopping, healthcare and senior centres a necessity.

The increased traffic congestion will cause issues not limited to wildlife disruption, but potential accidents and risks to children attending these schools, which my oldest will start this fall.

I am a long time user of McKenzie trails, and Gaetz Lake Sanctuary. It would be a shame to negatively impact two of Red Deers gems.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Subject: [External] Waskasoo... East Lincoln Property appeal
Date: January 20, 2026 2:09:52 PM

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I am a resident of Waskasoo. At present, the traffic in area is a problem. Adding a 48 unit apartment is beyond ridiculous. I agree with the stance taken by the Waskasoo Community Association, Reddeer Public School Board, Waskasoo Environment Education Society, Gaetz Sanctuary Committee and Reddeer River Naturalists.

Sincerely

[REDACTED]

From: [REDACTED]
Cc: [Appeals](#)
president@waskasoo.info; Susan J
Subject: [External] SDAB 0262 006 2025
Date: January 19, 2026 11:18:48 AM

You don't often get email from [REDACTED] [Learn why this is important](#)

To whom it may concern,

I believe the proposed development of a 48 unit apartment building at 4240-59th Street is a very bad idea. I like to visit the sanctuary nearby and the Gaetz Lake area. This structure would make access to the area much more inconvenient, increasing traffic at an already difficult corner.

It is out of character with the idea of a wild refuge within a city. More suitable would be a quiet transition area between the residential and the wildlife refuge area. A park, or even a daycare would be better than an apartment building.

Wildlife in the area will be scared, thereby restricted in their movement and access to the refuge.

Please don't allow this to happen. There must be more suitable places to build this type of structure.

Thank you,
[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Subject: [External] Comments for Appeal number SDAB 0262 006 2025
Date: January 26, 2026 4:16:54 PM

You don't often get email from [REDACTED] [why this is important](#)

To whom it may concern,

I am writing to formally state that I do not support this development as proposed. As one of the properties closest to the proposed development, I will be directly and significantly impacted.

My concerns include;

The size of the building and potential future developments if this development is approved.

Loss of privacy due to overlook from proposed windows and balconies.

Significant increase in traffic and parking to an already overloaded area. Congestion creates a safety risk for our children walking to school.

Impacts to the existing trail system, views, and environmental character of the area.

Potential property value loss due to obstruction of river and nature views that we enjoy.

These impacts are inconsistent with the intent of the Waskasoo Area Redevelopment Plan and the established character of the neighbourhood.

For these reasons, I strongly oppose the proposed development.

Thank you for considering our comments.

Sincerely,

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]



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From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.info
Subject: [External] Appeal#SDAB 0262 006 2025
Date: January 17, 2026 10:51:12 AM
Attachments: [image0.png](#)

[You don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Sent from my iPhone



3:24



Dear Mr. Harlett and City Council

We are residents of this beautiful community and are voicing our concerns regarding this development proposed for our area. Although we are not longtime residents of this neighbourhood we have lived here for 4 years on 45th street. We were drawn to this area because of the extensive river valley trails and parks as well as this community is where are grandchildren attend Gateway and Lindsay Thurber Schools.

Over these past 4 years we have been involved in protesting and voicing our concerns regarding the last proposal to this area by this developer.

One of our major concerns has been the influx of travel on 45th street not only for the schools but Kerry Wood and McKenzie Trails. While we love this area for these programs we already are seeing congested traffic and long waits to get out of our driveways. Our concerns are with further expansion being proposed by this developer we will have even more congestion in an already taxed system. As well we are further concerned with the impact this will have on the wildlife in are area. We are home to deer and moose and many other birds and wildlife which thrive on this riverbank corridor.

Why is this developer and the city hell bent on changing this beautiful community. This truly is one of the best areas in Red Deer however it was not designed to accommodate this type of development. There are new areas within the city limits that could include this type of proposal. We pray that you will reconsider this proposal and hear the people and look at the future and choose a community area that is just in the development stages that could with stand this proposal.

Thankyou for listening

[REDACTED]

mail.google.com

From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.info; karenczu@telusplanet.net
Subject: [External] Appeal # SDAB 0262 006 2025
Date: January 27, 2026 10:58:48 AM

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Good day,

I am a resident of Waskasoo - a 30 year resident. A key part of the attraction and image of this area are the space, history and access to the parks and trails.

The proposed 3 story building provides nothing - absolutely nothing to the neighborhood. I walk and bike through this area to get a view of the river, the parks and the history that is Waskasoo.

This proposed building does many things - none of which are positive for the area.

- Traffic - that is already far beyond design capacity (See City of Red Deer Traffic design standards) for a road that size.
- Traffic on 55th Ave is incredibly busy in the morning and afternoon in/around school start and end. This building will make things worse.
- A 3 story building does not belong in this area. Even the previously approved '2 story buildings' the city sadly approved made the attraction and fit to the adjacent homes terrible. A new 3 story building in a history area will absolutely not fit in.
- The road to Kerrywood is a pleasant country road that accommodates both pedestrians and cyclists. The proposed building will remove make those options dangerous enough to basically eliminate it.

The building proposed may well have a demand. That is great. There are many new neighborhoods in Red Deer that are both designed for the additional traffic and can seamlessly accommodate a 3 story building. Have them build there.

Kind regards,

[REDACTED]
Long time Waskasoo resident

[REDACTED]

From: [REDACTED]
Cc: [Appeals](#)
secretary@waskasoo.info
Subject: [External] SDAB 0262 006 2025. Appeal
Date: January 26, 2026 8:42:36 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

January 26, 2026

Attention: **Subdivision and Appeal Board (SDAB) SDAB 0262 006 2025**

I understand that 4240 59 St is privately owned, developable, Public Service land. However, because of its location along the Red Deer River, adjacent to the Waskasoo Park system and South (right) Bank Trail, as well as near major nodes in the Red Deer park system, including the Gaetz Lakes Sanctuary, Kerry Wood Nature Centre, and McKenzie Trails, development here stands to impact amenities shared by the entire city.

I understand the need for development, but at the same time consultation with community and the citizens on what will work for the area has not been met. My concerns are as follows:

1. Safety - As a citizen that walks, bikes and drives to Kerry Wood and the MacKenzie trail system at least two to three times a week, the traffic will have a big impact
 - a. Street crossing for children for the schools in the area will be more at risk as more traffic will be driving through 42a Avenue to avoid the narrow 45 Avenue Road to MacKenzie Trails.
 - b. Animals crossing from the river will be more at risk.
2. Traffic Congestion - The roads already face heavy congestion during school hours and events. Adding additional traffic for forty eight units plus adding vehicles for staff, visitors and delivery is not supportive. If this is a "true" senior complex, how will a handi bus or regular bussing service get around the area.
3. The development violates the spirit and intent (Environmental Character statements) of the Waskasoo Area Redevelopment Plan (ARP)

In closing, it saddens me to see this area developed into a large complex. From the plans and development outlined it will be for those that can afford high-end housing, not meeting the needs of affordable or assistance living housing for seniors.

This is all at the expense of the neighborhood, the wildlife that will be affected, including the trees that will be removed and the enjoyment of this unique area of Red Deer.

Regards,

[REDACTED]
[REDACTED]

From: [Appeals](#)
To: [Appeals](#)
Subject: Email - Agreement with community groups statements - SDAB 006 2025 - [REDACTED] - Received January 20, 2026
Date: January 20, 2026 1:54:22 PM

From: Appeals
Sent: January 20, 2026 1:54 PM
To: [REDACTED]
Subject: Email - Agreement with community groups statements - SDAB 006 2025 - Glynis Seifried - Received January 20, 2026

From: [REDACTED]
Sent: January 20, 2026 12:12 PM
To: Appeals <Appeals@reddeer.ca>
Subject: [External] "I agree with the stance taken by the Waskasoo Community Association, Red Deer Public School Board, Waskasoo Environmental Education Society, Gaetz Lakes Sanctuary Committee, and Red Deer River Naturalists." This has too many people and o...

You don't often get email from [REDACTED] [Learn why this is important](#)

"I agree with the stance taken by the Waskasoo Community Association, Red Deer Public School Board, Waskasoo Environmental Education Society, Gaetz Lakes Sanctuary Committee, and Red Deer River Naturalists."

From: [REDACTED] [ca](#)
To: [Appeals](#)
Subject: [External] East Lincoln development in Waskasoo
Date: January 22, 2026 10:35:52 AM

[You don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

To whom it may concern

Re: East Lincoln development in Waskasoo.

Although we do not reside in the area that is directly affected by this proposed development, we do live in the Waskasoo area. We do have concerns relative to this development and potentially other developments that are planned within a "Supportive Living" context.

Please accept this email in support of rejecting the current development of the East Lincoln development on the land between Gateway School and the Red Deer River.

Although we do not object to a development of some nature on this parcel, we believe that the development proposal as presented does not meet the character of the neighborhood. We believe the current development proposal will adversely affect both the surrounding homes and neighborhood and will have a significant negative impact on wildlife flow, traffic and density in the area. Further, we disagree with the current zoning definition for a supportive living development. In our opinion, the definition for a supportive living complex is too broad and amounts to nothing more than providing potential minimal supports while building a full apartment block with all the accompanying amenities and concerns. These are not the parameters for which the supportive living zoning was designed to meet.

In our opinion, the appeal should be rejected, and we suggest the following course of action.

1. Inform the developer that the appeal has been either rejected or deferred until city administration and council can deal with the issue of a proper definition for a supportive living development within the land use by-law.
2. While waiting for the definition to be resolved, suggest that the developer meet with the key neighborhood stakeholders for input on what type and configuration of a development would be amenable. It seems to us that there are significant concerns about placement and traffic flow for the current proposal. Obviously, a public meeting of this nature would be quite contentious and non-productive, but perhaps there is a vehicle by which the developer and the key stakeholders could enter into a constructive dialogue.

Thank you for your consideration of this matter.

[REDACTED]

From: [REDACTED]
Cc: [REDACTED]
Subject: [REDACTED]
Date: [REDACTED]

Appeals; City Council; EMSFire; planning@reddeer.ca
secretary@waskasoo.info
[External] Appeal Number #SDAB 0262 006 2025
January 15, 2026 2:54:36 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Sir/Madam

I am writing to express my opposition to the development of the apartment building at 4240 - 59 Street, between Gateway Christian School and the River.

I have written on numerous occasions that I oppose this development due to the fact that there is questionable adherence to the Waskasoo Neighborhood Plan and Waskasoo Character Statements. There are also numerous safety concerns in regard to traffic, City services and Emergency response times. The environmental and aesthetic impact of this building have not been addressed adequately, in my opinion. I am also concerned as to future development on this site, once the initial project is or is not completed.

Concerns regarding Waskasoo Neighborhood Plan and Waskasoo Character Statements:

In a response I received from Jay Hallet (Senior Development Officer) he said that the developer has added various architectural elements to meet the requirements of the Waskasoo Character Statements. From the drawings and schematics we have seen, I can see nothing that indicates anything has been done to make this building integrate architecturally with Waskasoo. I believe the building does NOT meet the roofline design nor height requirement of our Neighborhood. The building is essentially a giant shoe box, this does not fit into a neighborhood that is approximately 75 years old.

The present plan for this building does not conform with the setback of the school that is on the same street. This building needs to be relocated (moved back) so that it conforms with the rest of the street. This may result in being able to conserve the trees that are on this boulevard, rather than cutting them down.

As you are aware, parking is an immense problem because of the added traffic from the 3 schools and daycare in our neighborhood. At present, School Busses line up twice a day along 59 Street before and after the school day. I cannot imagine being a resident of this facility, when school buses are sitting mere meters away from your front door, while idling at the curb. Where will

visitors to this seniors facility park once visitor parking at the complex is full? On street parking is at a premium, because of the schools. There simply is no room for extra cars to be parked on our neighborhood streets. I was quite dismayed at the attitude of the City Engineer at the MPC meeting on November 19, 2025. He treated our concerns about traffic and parking as a "minor inconvenience" and was quite dismissive of the issues we brought forward. It is NOT a minor inconvenience to be unable to leave your home twice a day for a half hour each time, due to excessive traffic and gridlocked roads.

Safety concerns - City Services and Emergency Services:

How will city services, such as power, water, sewage and gas be affected by the additional demand put on the existing system? Remember, this neighborhood and its infrastructure are a minimum of 75 years old. In the Bowness area of Calgary, which has an older infrastructure, they have been experiencing power outages, water shortage, water pressure issues and sewer back ups, due to the increased demand on the system because of increased population density in the area. How will the City of Red Deer guarantee that residents of our neighborhood will not have to endure these types of interruptions in service?

Emergency Response Times: The City of Red Deer has supplied no information in regard to response times for Fire, Ambulance or EMT in Waskasoo. Twice a day our roads are grid locked for about a half hour each time. We have yet to hear how Emergency Services will respond in a timely manner to our homes. With the development of a seniors facility, there will be an increase in Emergency responses to this building as this is a statistically proven fact. Personally I have experienced on more than one occasion where it has taken me 30 to 40 minutes to access 55th Street, from my home. This is a matter of 3 blocks.

City Bylaws Enforcement: I am unable to understand why we NEVER see bylaws enforcement in our neighborhood during peak traffic and parking, on school days. It is fairly common to see them in the evening or on the weekends, but at no time do bylaw officers enforce parking or traffic restrictions during school times. Our neighborhood needs to have better coverage and more frequent visits by bylaw officers who will prevent blocked driveways, infringement of alleyways, parking in front of fire hydrants, infringement on crosswalks or speeding. I invite you to come to my neighborhood on any school day, when school is either starting or ending. You will see these violations occurring daily.

South Bank Trail System: The access to this development will cross the river bank trail system. This needs to be addressed in order to avoid possible accidents or infringement on the flow of pedestrian traffic and bicycles on the paths. There is also the aesthetic impact this will have on trails, just one more paved crossing to affect the pathways system.

Environmental and Aesthetic Impact:

The location and height of this building will dramatically affect the aesthetics and views from neighboring properties. The building will block the vista from the south side of 59th Street looking to the north. Homes located on this street have long enjoyed the open view to the north. Not only will this building impede the view but will also infringe on the privacy that people enjoy while in their yards. Views from the balconies will look down directly into peoples yards, robbing them of their privacy and peace of mind.

The area that is to be developed is directly under the migratory flight path for many birds that use the river valley. It is common to see pelicans, numerous varieties of geese, trumpeter swans, hummingbirds, ducks, eagles, hawks, falcons and various song birds in this area. This is also a major transit route for large mammals, such as deer, moose, coyotes, cougars, rabbits and various smaller rodents. This development will negatively affect the natural balance in this section of the river valley.

There appears to be no information made available in regard to underground water flow and drainage. What steps has the developer taken to ensure that the water table in the area will not be affected, especially since it is so close to the rivers' edge? It would be disastrous if this development were to increase or affect the natural erosion of this part of the riverbank.

Future Development:

Judging from the schematics and renderings that have been submitted to residents who will be impacted in our neighborhood, it would appear that the developer is leaving room for the development of more buildings, between 59th Street and the Red Deer River. I would vehemently object to further development on that parcel of land, as the impact would be extremely detrimental to our neighborhood and the river valley. The City of Red Deer and Waskasoo Residents needs to know what the developers intentions are for the future.

Sincerely yours,



From: [REDACTED]
To: Appeals; secretary@waskasoo.info
Subject: [External] Appeal number #SDAB 0262 006 2025
Date: January 12, 2026 10:35:50 AM

You don't often get email from [REDACTED]. [Learn why this is important](#)

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Re: Appeal number #SDAB 0262 006 2025

To Members of the **Subdivision and Appeal Board**,

Red Deer as a city is known for its beautiful natural river valley surroundings. The many parks, bike/walking paths and green spaces have made Red Deer so attractive to live in.

We ourselves moved after retirement back to Red Deer to be able to enjoy that and moved in the beautiful neighbourhood of Waskasoo. The river valley is the “Green Pumping Heart” of the city. It gives Red Deer its unique appeal.

Red Deerians have enjoyed the peace and tranquility of the natural spaces afforded by the Waskasoo Park system and the connecting natural areas.

Once we get on the slippery slope of approving this development adjacent to a natural area, more future developments near other natural areas could come.

To keep the “City of Red Deer Natural Character” for the future, this development shouldn’t be approved.

My concerns are worded very well by the “Waskasoo Environmental Education Society” in the

following points:

- Loss of Permeable surfaces
- Riverbank Stability
- Barriers to Wildlife
- Trail Realignment
- Increase in Traffic
- Increase in Pedestrian Traffic
- Light Pollution
- Invasive Plant Species
- Waskasoo Area Restructuring Plan (ARP) Requirements

These requirements were set to maintain the Character of the area. Ignoring these requirements and seeing that the development is lacking in many aspects of these requirements feels wrong.

Beside that:

- Access to the parking area needlessly crosses the South Bank trail creating a hazard for trail users
- The location of the building across the south end of the lot next to the 45th Ave lookout:
 - impinges on the already severely compromised wildlife corridor along the Red Deer River, and
 - will increase run off from concrete and asphalt surfaces into the Red Deer River and Waskasoo Creek watershed
- The development will add traffic and congestion to 45th Avenue and the rural road access to McKenzie Lakes.
- The development does not meet the requirements laid out in the Environmental Character Statements in the Zoning Bylaw

Regards,

[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.info
Subject: [External] SDAB 0262 006 2025
Date: January 22, 2026 9:07:34 AM

Hello again,

I mistakenly sent the wrong letter to you. There has been quite a bit of back and forth about this parcel of land. I have written more than once. Here is a resend of my letter that is more specific to this particular decision. Thank you for your understanding,
Janet Cole

I am adding my name, AGAIN, in support of the opposition to a certain parcel of land. I attended a public hearing at City Hall, that saw over 100 people with the same opinion, just a couple short years ago, Am using the well crafted letter by a hard working volunteer closely connected to the details of this continuing assault. Have you lost the narrative that Red Deerians cherish our parks and are tired of continually defending them? That in 2025 we should be past the focus of develop to the max and throw out well thought out arguments for nature that are supported by many organizations with expert information about the value of natural areas to a city and its citizens?

Please add another citizen opposing this. Here is the letter:

Attention: Members of the Municipal Planning Commission

I understand that 4240 59 St is privately owned, developable, Public Service land. However, because of its location along the Red Deer River, adjacent to the Waskasoo Park system and South (right) Bank Trail, as well as near major nodes in the Red Deer park system, including the Gaetz Lakes Sanctuary, Kerry Wood Nature Centre, and McKenzie Trails, development here stands to impact amenities shared by the entire city.

I submit the following concerns regarding this application:

1. Access to the parking area needlessly crosses the South Bank trail creating a hazard for trail users
2. The application should include 28 more trees and shrubs to meet the minimum landscaping requirements.
3. The location of the building across the south end of the lot next to the 45th Ave lookout:
 - a. impinges on the already severely compromised wildlife corridor along the Red Deer River and Waskasoo Creek, and

b. will increase run off from concrete and asphalt surfaces into the Red Deer River and Waskasoo Creek watershed

4. The development will add traffic and congestion to 45th Avenue and the rural road access to McKenzie Lakes.

5. The development violates the spirit and intent (Environmental Character statements) of the Waskasoo Area Redevelopment Plan (ARP)

Sincerely,

A solid black rectangular box used to redact a signature.

From: [REDACTED]
Subject: [REDACTED] [Appeals](#)
Date: [External] SDAB 48 Unit Appeal
January 21, 2026 10:07:09 AM

You don't often get email from [REDACTED] [Learn why this is important](#)

Hello, I agree with the stance taken by the Waskasoo Community Association, Red Deer Public School Board, Waskasoo Environmental Education Society, Gaetz Lakes Sanctuary Committee, and Red Deer River Naturalists.

[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Subject: [External] Waskasoo Appeal
Date: January 23, 2026 9:37:04 AM

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Board Members,

As a Waskasoo homeowner, an employee at Lindsay Thurber High School, and a parent of two children who attended Camille J. Lerouge School, I consider myself deeply invested in the Waskasoo neighbourhood. In my opinion, it is one of the best neighbourhoods to live in Red Deer. It offers a strong sense of safety, excellent community involvement, and beautiful walking paths and natural scenery.

I am writing to express my support for the position taken by the Waskasoo Community Association, Red Deer Public School Board, Waskasoo Environmental Education Society, Gaetz Lakes Sanctuary Committee, and the Red Deer River Naturalists.

While there are many positive aspects of our neighbourhood, there are also real challenges. My primary concern with allowing this project to move forward is safety. Waskasoo is a small neighbourhood that already contains three large schools, all operating at or near capacity, with very limited roadways. During peak hours, traffic congestion makes it extremely difficult to enter or exit the neighbourhood. Heavy traffic already creates safety concerns for children walking to and from school.

Adding multi-tenant residential buildings would significantly increase traffic and further strain an already overwhelmed infrastructure. During peak times, even emergency vehicles such as ambulances could have difficulty accessing the neighbourhood. For these reasons, I strongly believe there are more suitable locations within Red Deer for a development of this nature.

Thank you for your time and consideration.

Sincerely,

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Subject: [External] Appeal number #SDAB 0262 006 2025
Date: January 26, 2026 11:24:17 PM

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Sir; If this 48 unit apartment is built, the city will have to rebuild 59 ST.. and also 45 Ave.. as these two roads are too narrow to safely handle the increase of traffic.

If 45 Ave doesn't get widened, it will never be able to safely handle the increase of traffic. If the city widens this Ave. you can say goodbye to about 60 or more 70 year old trees.

Regards, [REDACTED]

From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.info
Subject: [External] Appeal # SDAB 0262 006 2025
Date: January 27, 2026 9:30:37 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

We fully support the Waskasoo Community Associations rejection of this development appeal by East Lincoln Property This application does not conform to the zoning bylaw, Waskasoo Area Development Plan, and the Environment Character Area and Character. This application will interfere with neighbourhood amenities, and will affect the use , enjoyment, and value of neighbouring properties and families.

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [REDACTED] [Appeals](#)
Subject: [External]
Date: January 12, 2026 4:38:41 PM

You don't often get email from [REDACTED] [learn why this is important](#)

Re: #SDAB 0262 006 2025

East Lincoln Development Appeal

We are in receipt of your letter informing us that East Lincoln is appealing the City's decision on the development of the lot adjacent to the Gateway Christian School.

Our position has not changed from the last number of letters we have written.

WE ARE NOT IN FAVOR of this development being allowed as is.

East Lincoln continues to disregard the concerns of existing residents of the neighborhood.

This development will:

- 1) have a direct impact on the residents currently living along 59th street, as well as my own residence on 45 ave, no one wants a balcony overlooking their existing property
- 2) significantly increase traffic in the area, traffic is already a problem in this area, even though the city tells us its not
- 3) be a major disruption to an existing wildlife corridor
- 4) by allowing the first edition facing 59th it opens the appeal up completely to his addition of a west facing complex in later time.

It is our hope that the City of Red Deer will stay with its initial decision to deny the current application for development as it is.

[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Subject: [External] Fwd: Appeal SDAB 0262 006 2025
Date: January 18, 2026 11:16:19 AM

You don't [REDACTED]

[REDACTED]
[REDACTED]
Date: Sun, Jan 18, 2026, 9:39 a.m.
Subject: Appeal SDAB 0262 006 2025
To: <appeals@reddeer.ca>, <secretary@waskasoo.info>

I am a resident of the Waskasoo neighborhood who would be adversely affected by the East Lincoln Property Development along 59 St.between Gateway and the river.

Reference : appeal #SDAB 0262 006 2025.

The quality of my life related to daily dog walking along the south Bank trail would be diminished by the devopment in question.The connection with nature that exists in this neighborhood was great determining factor in my decision to purchase a home here.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.info
Subject: [External] #SDAB 02620062025
Date: January 27, 2026 4:04:10 PM

You don't often get email from [REDACTED] [why this is important](#)

Hello,

I am a long time Waskasoo resident and am gravely concerned regarding the appeal of East Lincoln property of the 59 st location. The proposed building has no redeeming value in being squeezed into this location and will adversely affect all residents of this unique and historic neighborhood. Increased traffic on an already overused road will directly affect school children, trail users and emergency access to the area. An oppressively large building will be a continual visual block to all those using the area including wildlife seeking to access the river valley in an already bottle necked location. Concerns regarding riverbank integrity, water/runoff and integrity of how this area connects to the other Red Deer parks. As a resident who frequently uses the trails and this neighborhood, myself and my neighbors will be physically and psychologically negatively affected every single day by the oppressive and adverse affects of this building should it go ahead with development. I ask for serious consideration of these concerns and I thank you for your time.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Subject: [External] East Lincoln Appeal of MPC division of proposed development 4240-49 St., Red Deer, AB.
Date: January 24, 2026 6:50:34 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

Attention: Members of the Subdivision and Appeal Board

I am writing to express concern and opposition to the appeal of the municipal planning commission's rejection of the proposed development application for a 3 storey independent senior apartment building at 4240-49 St., Red Deer, AB by East Lincoln Development. As a resident of Red Deer, the proposed development will negatively impact our family's use and enjoyment of the south bank trail, Kerry Wood Nature Centre, and Mackenzie Trails.

The proposed application is not suitable from a character standpoint given the surrounding neighborhood, and does not meet the Waskasoo Environmental Character Statement. Tall, apartment style buildings are more common along 55 St., compared to the residential and school structures that are closer to the river. This area is an important part of the green space and river valley system offering recreational space, and wildlife corridors in the area; however, the proposed development would cause further habitat fragmentation and loss. The building is excessive for the area given the character of the mature neighborhood, and views of the riparian area and river will be obstructed. The fragmentation of habitat, loss of mature trees, and potential wildlife impacts should be a consideration in the evaluation of the merits and suitability of the appeal.

Given the multi-story structure proposed for this corner lot, visibility would be adversely impacted along 45 Ave in an already high traffic location due to the existing residential, neighborhood school, trail, and park use traffic. In addition, the proposed entrance on 45 Avenue crosses the existing bike path, impacting trail safety, and 45 Ave acts as the single access point to Parkland Community Living and Supports, Kerry Wood Nature Centre and Mackenzie Trails. The proposed development will increase traffic in an already congested area that is not serviced by public transit (except along 55 St on the southern edge of the neighborhood), and will negatively impact current residents, school attendees, and users of Kerry Wood Nature Centre and Mackenzie Trails with loss of long standing vistas of the Red Deer escarpment.

I urge you to uphold the municipal planning commission's decision.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Cc: [REDACTED] secretary@waskasoo.info
Subject: [External] Opposition to Appeal #SDAB 0262 006 2025 – 4240 59 St Development
Date: January 27, 2026 6:54:24 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

To the Subdivision and Appeal Board,

We are writing to urge the SDAB to uphold the Municipal Planning Commission's unanimous decision to refuse the development permit application for a 48-unit apartment building at 4240 59 St.

Based on the information provided by the Waskasoo Community Association and the clear conflict with our neighborhood plans, we strongly oppose this development for the following reasons:

1. Non-Compliance with the Waskasoo Area Redevelopment Plan (ARP)

The proposed development fails to meet the requirements of the ARP's Environmental Character Area and Character Statements. These statements explicitly state that development must respect the mature street character. The proposed 3-storey building is excessive in form, height, and massing, obstructing long-standing views and vistas of the river escarpments that the ARP is designed to protect.

2. Severe Traffic and Safety Hazards

Traffic studies and local observations indicate that 45th Avenue—an 11m wide undivided roadway—is already operating at 250-350% overcapacity. Introducing high-density housing here will exacerbate this congestion. Furthermore, the lack of sidewalks on the south side of 59 St, combined with existing school bus parking for Gateway School, creates a dangerous environment for school children. The proposed access road poses an additional hazard to the trail system.

3. Environmental Impact on Protected Areas

This development threatens our critical natural amenities. The access road and building placement impinge on the South Bank Trail and natural boundaries of the river escarpment. This construction risks narrowing essential wildlife corridors and negatively impacting water quality and ground water recharge, threatening the adjacent Gaetz Lakes Sanctuary and Waskasoo Park.

4. Negative Impact on Neighboring Properties

The design allows for significant "overlook" from dozens of windows and balconies, directly invading the privacy of homes on 59th St, 45th Ave, and 44th Ave. By siting the rear of the structure towards existing homes, the development closes itself off from the community rather than integrating with it, negatively affecting the use, enjoyment, and value of neighboring land.

5. Inappropriate Land Use

While the land is privately owned, it is a Public Service lot deeply integrated into the Waskasoo Open Space Major System. Any development here must fit the City's statutory plans. There are other less intrusive uses (such as recreation or cultural facilities) or smaller-scale supportive living accommodations that would be better suited to this location without violating the ARP.

We request that you dismiss the appeal and support the MPC's refusal of this permit to protect the integrity and safety of the Waskasoo neighborhood.

Sincerely,

A solid black rectangular box used to redact the signature of the sender.

From: [REDACTED]
To: [Appeals](#)
Subject: [External] East Lincoln Properties Appeal
Date: January 20, 2026 12:52:03 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

Good afternoon.

With respect to this matter, I agree with the stance taken by the Waskasoo Community Association, Red Deer Public School Board, Waskasoo Environmental Education Society, Gaetz Lakes Sanctuary Committee, and Red Deer River Naturalists.

Best Regards,

[REDACTED]

[REDACTED]

The email you receive from [REDACTED] including any attachments, may contain confidential and/or privileged information for the intended recipient(s) only and the sender does not waive any related legal rights or privilege. Any use or disclosure of the information by an unintended recipient is unauthorized and prohibited. If you have received an email message in error, please delete the entire message, including attachments if any, and inform us by return email.

From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.info
Subject: [External] opposing MPC appeal
Date: January 03, 2026 1:23:28 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

Hi there,

I am writing to express my deep opposition to the proposed zoning change and development in Waskasoo by East Lincon Properties.

I would love to write a lengthy email but feel as if your time is as valuable and in demand as mine, and others. Key points.

-Our high density housing is already 60% vs an average of around 20% in Red Deer. Should you not consider those other areas first? With high density comes some issues, and we have shouldered more of the burden already.

-The infrastructure is already very strained with the schools, high density housing, and public centers (Memorial and Kerrywood). You want to worsen that?

-We have empty developments with a similar profile (Capstone). As a taxpayer, it blows my mind that you are going to anger existing residents while leaving a prime location untapped that we (taxpayers) have already wasted a ton of money on to develop.

-I've already moved my business of 30+ employees from the downtown/river adjacent community because of initiatives like this. I truly want the downtown/riverside areas to thrive but you are doing the exact opposite of what residents and businesses alike need to thrive! Please listen to your constituency!

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.info
Subject: [External] Waskasoo
Date: January 25, 2026 9:04:54 PM
Attachments: [image0.jpeg](#)
[image1.jpeg](#)
[Video.mov](#)
[image2.jpeg](#)

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

As a mother, a wife, and a registered nurse, I understand that a home is not defined solely by walls and property lines. A home is where children develop a sense of safety, where families build routines, and where everyday experiences quietly shape physical, emotional, and mental well-being. The proposed East Lincoln development would permanently and irreversibly destroy our family's ability to enjoy our home in the way it was designed, relied upon, and lived in for over a decade.

Our home was intentionally renovated to open toward the green space and river corridor because that environment is integral to how our family lives. The large windows, second-storey addition, and open deck were not aesthetic luxuries; they were deliberate design choices centered on family life—allowing natural light, visual openness, privacy, and connection to nature. These elements support calm, routine, and balance, all of which are especially important for children. The proposed development would replace these qualities with a constant visual and psychological presence of an over-40-foot building mass directly adjacent to our home.

The impact on our children is particularly distressing. Our backyard and the adjacent green space are where they play freely, ride their bikes, explore independently, and learn confidence in a safe, familiar environment. These are daily activities that define childhood. The proposed building, with 24 balconies and 85 windows positioned above and around our property, would subject these moments to constant observation. The knowledge that strangers would be looking down into our yard transforms a safe family space into one of exposure and anxiety. Children should not grow up feeling watched in their own backyard.

As a nurse, I am acutely aware of how environments affect mental health and development. Children need unstructured outdoor play, privacy, and a sense of control over their surroundings. The loss of these conditions forces children indoors, restricts natural movement, and replaces freedom with caution. This is not an abstract concern—it is a direct, lived consequence of the building's massing, height, and design. No fencing, landscaping, or conditions can meaningfully mitigate the sense of surveillance created by elevated balconies and windows overlooking a family's private space.

The loss of enjoyment extends beyond the backyard. Inside our home, the existing vistas toward the river corridor and treeline create openness, natural light, and a sense of peace that shapes our daily routines. These views are visible from our main living areas and are central to how we use our home—quiet mornings, shared family meals, evenings spent together in a space that feels calm and

restorative. Replacing these views with a continuous wall of building mass fundamentally alters how our home feels and functions. Living spaces that were designed to face nature would instead face dominance, enclosure, and visual intrusion.

This change is permanent. Once the building is constructed, there is no remedy that can restore lost views, privacy, or family enjoyment. Unlike temporary construction impacts, this harm does not end. It repeats every day, every season, and for as long as we live here. The Land Use Bylaw and the Waskasoo Area Redevelopment Plan exist to prevent precisely this type of irreversible loss to established families, yet the proposed development disregards those protections entirely.

The emotional impact on our family is compounded by the scale and form of the building itself. A structure exceeding 40 feet in height, described as supportive living but functioning as multi-family residential, rises like a wall along our property edge. It dominates the skyline, casts both literal and emotional shadows, and permanently alters the character of a space that was once open and welcoming. The presence of 24 balconies and 85 windows looking down into our home removes any remaining sense of privacy, dignity, or comfort.

This development does not simply inconvenience us; it erases the way we live as a family. The freedom for our children to play outside without self-consciousness, the ability to enjoy outdoor meals, the quiet enjoyment of our deck, and the sense of peace that comes from living beside green space will all be lost. These are not minor lifestyle preferences. They are fundamental components of a healthy home environment.

From a broader perspective, this loss of enjoyment is inseparable from the economic, environmental, and planning harms already identified. The destruction of river views, treed screening, and green space directly devalues our home by tens of thousands of dollars, transferring that value to the developer. The environmental degradation of drainage lands feeding Gates Lake and the disruption of wildlife corridors connected to the Kerry Wood Nature Centre further erode the quality of the environment our children experience daily. Increased traffic, under-parking, and a substandard access road introduce safety risks into an area where children walk and bike regularly.

Taken together, these impacts create a cumulative and overwhelming burden on our family. The planning framework recognizes that development must not unduly interfere with the enjoyment of neighbouring lands. In this case, enjoyment is not merely reduced—it is permanently destroyed. The loss is personal, ongoing, and irreversible, and it falls entirely on families who relied on the City's statutory plans when making long-term decisions about where to live and raise their children.

As a nurse, my professional life is centered on care, prevention, and long-term well-being. As a mother, my responsibility is to protect my children's sense of safety, stability, and joy. Approving this development as proposed would fail on both counts. It would allow maximum building yield to override human impact, and it would sacrifice the daily well-being of existing families for a form of

development that is incompatible with its setting and contrary to the Waskasoo Area Redevelopment Plan.

For these reasons, the loss of family enjoyment caused by the proposed East Lincoln development is not a secondary consideration—it is a central and decisive harm that the Subdivision and Development Appeal Board must weigh. Once taken, it cannot be restored.

I am also deeply troubled by how the proposed development is being described as “supportive living.” This characterization is not only misleading from a planning perspective, but profoundly disappointing from a health-care and community-care standpoint. Public Service (PS) land exists to serve genuine public needs. In the context of housing, that purpose has historically and clearly included true, government-funded assisted living and care-oriented facilities for seniors and vulnerable residents who require daily, regulated support—not market-driven, apartment-style housing presented under a softer label.

In my professional experience, assisted living is defined by continuous, structured care: on-site nursing or health-care staff, regulated support services, medical oversight, and integration with public health and social systems. These facilities serve people who cannot safely live independently and who depend on publicly supported care models. The East Lincoln proposal does not provide this. It does not function as assisted living, does not deliver regulated care, and does not meet the urgent and documented need for publicly accessible senior care in our community. Labeling it “supportive living” does not change its fundamental nature as standard, self-contained residential units operating at market rates.

This distinction matters deeply. PS-zoned land is limited and valuable precisely because it is intended to meet needs the private market does not adequately address. Approving a privately marketed, apartment-style development on PS land forecloses the opportunity to use this site for what it was actually meant to support: legitimate assisted living, long-term care, or community health-oriented facilities that serve seniors, people with disabilities, and those requiring daily assistance. Once this land is consumed by a misclassified residential building, that opportunity is lost—permanently.

As a nurse, I see firsthand the strain on families who are desperately trying to find appropriate, affordable, publicly supported care for aging parents and vulnerable loved ones. Those needs are real, pressing, and unmet. This proposal does nothing to address them. Instead, it uses the language of care to justify a development that neither delivers care nor advances public health outcomes. That is not just a planning issue; it is a moral one.

From a family perspective, this makes the harm even more difficult to accept. Our family is being

asked to sacrifice privacy, safety, green space, childhood experiences, and tens of thousands of dollars in home value—not to meet a critical public need, but to accommodate a private development that does not fulfill the purpose of the land it occupies. Had this proposal been for true assisted living—publicly funded, care-oriented, and integrated with health services—the conversation might be different. Instead, the community is being told to accept permanent harm for a project that simply does not deliver what PS land is intended to provide.

This misclassification also undermines trust in the planning system. Families rely on zoning and statutory plans to ensure that land reserved for public service remains available for genuine community benefit. Allowing a market-rate residential building to proceed under the guise of “supportive living” sets a dangerous precedent, signaling that PS land can be repurposed without rezoning, without meeting real care needs, and without accountability. As a health-care professional and a parent, I find that deeply concerning.

In the end, this proposal fails on two levels. It inflicts permanent, irreversible harm on existing families—destroying privacy, enjoyment, and childhood experience—while simultaneously failing to deliver the public benefit that might justify such impacts. It neither respects the Waskasoo neighbourhood nor fulfills the public service mandate of the land. For these reasons, the “supportive living” label does not mitigate the harm caused by this development; it highlights how misplaced and unjustified that harm truly is.



Moose crossing the street, through the fence and into the green space.



From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.info
Subject: [External] East Lincoln Properties proposed development, #SDAB 0262 006 2025
Date: January 26, 2026 10:35:45 PM
Attachments: [Existing North view_1024.jpg](#)
[Vista change projection_1024.jpg](#)

You don't often get email from [REDACTED] [Learn why this is important](#)

Good morning,

I'm writing today about the East Lincoln Properties proposed development in Waskasoo, #SDAB 0262 006 2025. I respectfully ask that you please take a few minutes to read this background information on the issue and I'm sorry for any repetition in the other letters you'll receive about it:

The developer had originally purchased this land as "public service" zoned land, but intended to build a large condominium anyway after rezoning to R3. When it seemed evident it would not be rezoned, they've continued alternative approaches to make the project viable in other ways. At present, the City has changed the definitions of acceptable use for PS land to be broad enough to consider certain types of living accommodation, leading to their recent proposal to MPC which was also unanimously rejected.

While the structure would be massive, and tower over any house in the entire neighbourhood, they were able to plan the height based on "adjacent properties"-in this case meaning that if you travel a couple of blocks away to the school building, then track inward to its highest point, you might find something comparable to the height they are proposing to build directly across the street from residences. Not only is this comparison nonsensical given the outcome, but clearly it makes an even more massive structure at its smallest point than the school it's being compared to. The proposed structure itself is much more like the new women's shelter building, if it continued much farther as one continuous building - a huge industrial structure one cannot even see the roof of without an aircraft.

This building would allow many vantage points into windows and backyards all up the block in an area never made for it, while denying existing residents of the neighbourhood a view of anything other than the wall of the building (please see the attached images - mathematically projected based on their architectural draft and proposed location.) The HVAC system needed by a building of this size is likely to add industrial levels of droning mechanical noise to the neighbourhood, particularly during the summer when people have to open their windows to stay cool. (The school is also audible but thankfully far away.) At other times, the proposed site is so long, it is likely to create a corridor of wind since it walls off blocks and storeys at a time. It will prevent natural soil drainage and further directly and indirectly overload the storm drains, which overflow and already mostly block off 44th Ave every spring. The massive shadow it casts will also no doubt greatly delay melting on sidewalks and roads which in the local grey routes, see little if any plowing in a year. It is so titanic it could actually alter the climate at its end of the streets that meet it. This violently clashes with the Waskasoo Character Statements which guide development in the area, as a single building would be contending in size and population with the next few blocks of residences like building a downtown area at once. It would clearly make most of the core of Ross St. downtown look insignificant in comparison next to it as even our urban core is largely single storey and much less continuous.

While it's been claimed that overall there is ample unused road capacity remaining to Waskasoo, this is disputed as being significantly overloaded already - and every weekday the rush of multiple schools' traffic slows traffic to a crawl as 55th St. is the only access to Waskasoo. Additional high density development that doubles the population of the area is not going to be supported by the existing roads and emergency vehicles at the worst times of day would have to try their best to squeeze through old packed roads with traffic lining both sides at a time, which has limited space to clear the way. Most of the time it is true that the roads are nowhere near capacity - but at certain times of day it is slammed and all of the traffic comes and goes to 55th St. via just 3 roads.

While we recognize the company's right to develop something within the city's guidelines and regulations, they have ignored proposals to tone it down and have instead tried to have the rules changed or bypass residents in order to find an mechanism that would approve the project as it is, rather than make some reasonable compromise. They have spent years now trying to ram the project through wherever they may find a way, trying to grind the neighbourhood down by attrition until we are too tired of trying to oppose them. From their most recent proposal to the municipal planning commission, they may bring your attention to some letters of support they received-and if you spend a short time tracking where those come from, they were virtually if not literally all from construction companies, construction material companies, or people who either own or hold significant stake in the same and do not live anywhere near the proposed construction site. After hearing their proposal, the Planning Commission unanimously refused to allow construction as it was. The letters written to the city are likewise almost unanimously opposed.

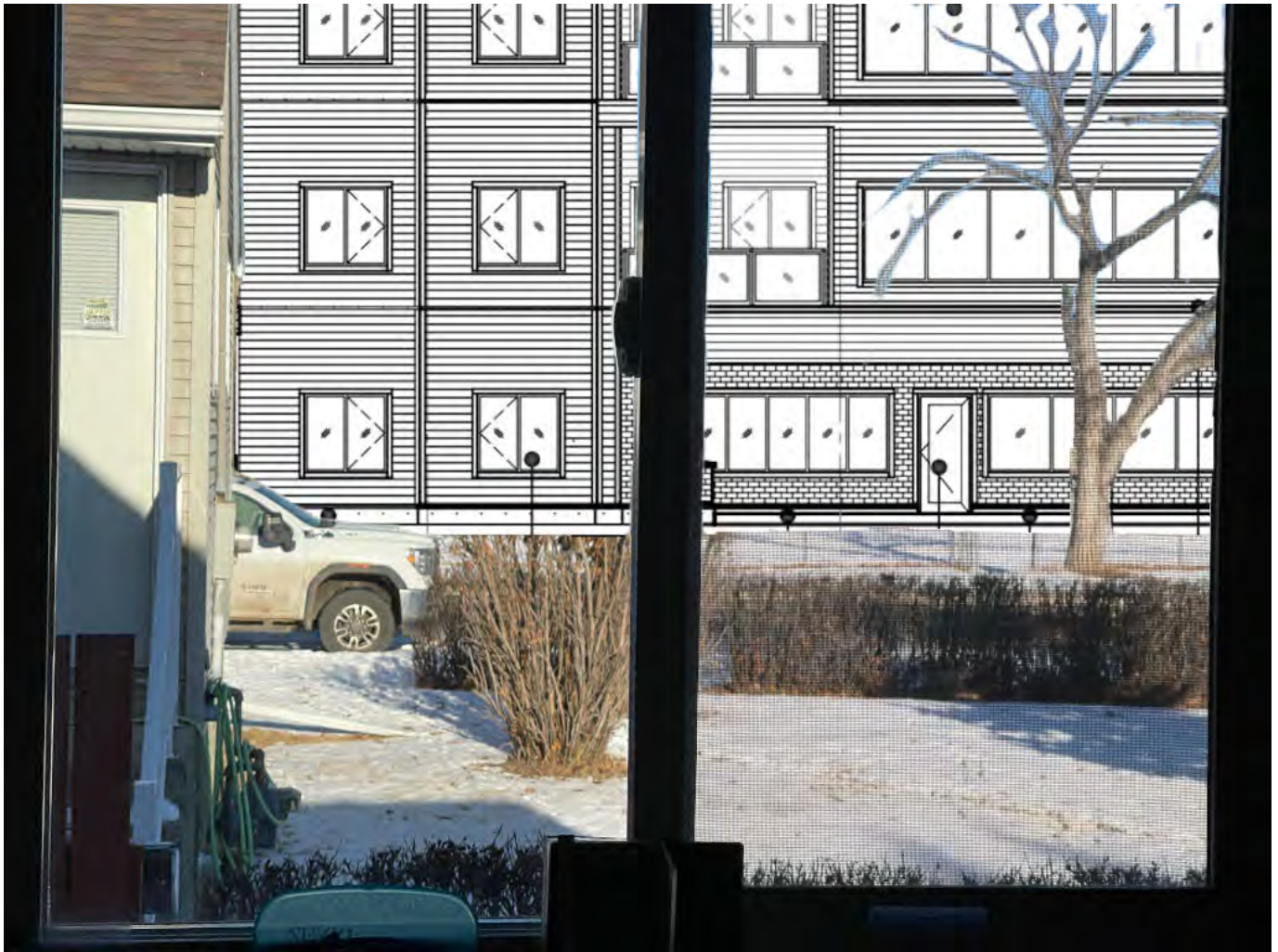
Please consider this context then as you hear their appeal.

Thank you for your time and consideration,



Existing North View

Vista change projection



From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.info
Subject: [External] Fwd: appeal Notice - Waskasoo #SDAB 0262 006 2025
Date: January 25, 2026 6:18:21 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

To the City of Red Deer Appeal Board,

I am writing as a nearby resident of the Waskasoo neighbourhood to formally appeal the approval of the proposed three-storey, 48-unit seniors development by East Lincoln Properties. I respectfully request that the Board deny this application, as it conflicts with the intent and specific policy direction of the Waskasoo Area Redevelopment Plan (ARP), which was created by the City of Red Deer in collaboration with neighbourhood residents to protect the environmental and historical integrity of this unique area.

I wish to acknowledge that East Lincoln Properties, as the property owner, has a legitimate interest in making reasonable use of its land. This appeal is not intended to challenge that right, nor is it a general objection to residential density or seniors housing. Rather, the concern is that while the proposal may meet the basic technical requirements of a development permit and building regulations, compliance alone does not determine whether a project is appropriate for a specific and highly sensitive location.

The Waskasoo neighbourhood is home to both people and wildlife, and its planning framework recognises that development decisions must consider more than minimum standards. The ARP clearly identifies that the area north of 59 Street and east of 42 Avenue requires a higher level of environmental protection and more sensitive development due to a shared drainage catchment area and its proximity to Gaetz Lake Sanctuary, Kerry Wood Nature Centre, Mackenzie Trails Recreation Area, and the Red Deer River.

Gaetz Lake Sanctuary is a provincially regulated bird sanctuary, and development within the sanctuary is not anticipated. Adjacent lands therefore, function as critical buffers that support wildlife habitat, movement corridors, groundwater recharge, and water quality. The proposed development would place additional pressure on these systems and would significantly impact wildlife that relies on the river valley and the surrounding natural areas.

The ARP further identifies that the Mackenzie Trails Recreation Area and future urban development lands are subject to multiple constraints, including floodplain and flood fringe conditions, erosion and slope stability concerns, and landfill setback requirements. As a result, the ARP explicitly states that no further intensification through an increase in the number of dwelling units shall be permitted in these areas. The proposed three-storey, 48-

unit development represents a substantial intensification that directly contradicts this policy direction. These lands are also not included within the Environmental Character Area, reinforcing that they are not intended to absorb additional development pressure.

This appeal is fundamentally about protecting the long-term environmental and historical integrity of Waskasoo, not about opposing development in principle. The neighbourhood already experiences high levels of traffic and activity—both vehicular and wildlife—due to surrounding schools, community facilities, and heavy use of the river valley trail system. Introducing a development of this scale in such a constrained location risks compounding existing pressures and eroding the qualities that residents and visitors alike value.

Transportation and access concerns further underscore this issue. The local road network is not a curb-and-gutter system and was not designed to accommodate the traffic volumes, parking demand, emergency access, and service requirements associated with a 48-unit development. Access that crosses or impinges upon the Southbank Trail would compromise safety, environmental function, and the rural, park-like character of the roadway, contrary to ARP objectives.

Finally, the orientation and design of the proposed building—specifically positioning the rear of the structure toward existing homes on 59 Street—creates a physical and visual barrier that isolates the development from the surrounding community. This approach is inconsistent with ARP principles that encourage compatibility, integration, and respect for established neighbourhood form.

The Waskasoo Area Redevelopment Plan reflects a shared commitment between the City of Red Deer and its residents to steward a historically significant and environmentally sensitive area. Just because a proposal can meet minimum regulatory requirements does not mean it is the best or most responsible use of this land. The environmental impacts on wildlife and the Red Deer River Valley would be significant and long-lasting.

For these reasons, I respectfully request that the Appeal Board deny the proposed development.

Thank you for your time and careful consideration.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Waskasoo resident 11 years

From: [REDACTED]
Cc: [Appeals](#)
secretary@waskasoo.info
Subject: [External] SDAB 0262 006 2025 – Opposition to East Lincoln Property Appeal (Directly Impacted Resident)
Date: January 20, 2026 1:21:11 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Members of the Subdivision and Development Appeal Board,

I am writing to formally oppose the appeal by East Lincoln Property of the Municipal Planning Commission's refusal of the proposed 3-storey, 48-unit seniors development at 4240 59 Street.

I am a directly impacted resident of the Woodlea neighbourhood. I live at [REDACTED]. I use the surrounding road and trail network **every day, multiple times per day**, including for bicycle commuting, running, and general access and enjoyment. This includes regular use of 59 Street, 45 Avenue, the South Bank Trail, Waskasoo Park, and the Gaetz Lakes Sanctuary corridor.

I respectfully request that the SDAB uphold the MPC's refusal for the reasons set out below.

1. Non-conformance with the Waskasoo Area Redevelopment Plan (ARP) and Zoning Bylaw

The proposed development does not conform to the intent or requirements of the Waskasoo Area Redevelopment Plan, including the Environmental Character Area and Character Statements, which form part of and prevail over the City of Red Deer Zoning Bylaw. These policies clearly prioritize protection of the river corridor, low-impact development, sensitive siting, and compatibility with established neighbourhood character.

The proposed building's height, massing, and scale are excessive for this location and incompatible with the environmental and character objectives governing this site. This is a highly sensitive interface between a school, a mature residential neighbourhood, and a protected river valley system. The proposal represents over-intensification of a Public Service lot where policy direction explicitly limits such impacts.

2. Traffic, safety, and infrastructure impacts are already severe and will be materially worsened

Traffic conditions in this area are already extreme due to Gateway School operations, constrained roadway widths, limited parking availability, and the absence of sidewalks along portions of 59 Street. As a daily cyclist and frequent pedestrian, I experience congestion and conflict points that are already difficult and, at times, unsafe to navigate.

Introducing a high-density residential development with new access points will significantly increase vehicle volumes and turning movements, intensifying safety risks for cyclists, pedestrians, school children, and residents. These impacts are not hypothetical — they are already occurring and would be materially worsened by this proposal.

3. Impacts to the trail system, wildlife corridors, and environmental health

The proposed access and site configuration introduce additional hazards to the South Bank Trail and negatively affect a critically important wildlife corridor connecting Waskasoo Park and the Gaetz Lakes Sanctuary. Increased traffic, noise, lighting, and site disturbance will disrupt wildlife movement, degrade biodiversity, and negatively affect water quality and groundwater recharge.

As someone who uses this trail system daily for commuting and recreation, I am directly impacted by the degradation of this public asset and the environmental harm associated with this development.

4. Loss of neighbourhood character, privacy, and longstanding views

The height and placement of the building will result in significant overlook from windows and balconies into surrounding homes, causing loss of privacy and erosion of established neighbourhood character. The proposal also obstructs longstanding views toward the river escarpment and parkland, diminishing the use, enjoyment, and value of neighbouring properties.

5. The proposal is characterized as “supportive living accommodation” but lacks clear, use-defining information

The appeal materials describe the proposal as a **48-unit supportive living accommodation**. Where a development relies on this classification, the submission must clearly demonstrate the operational and service components that define supportive living (including how services are provided or arranged to support residents’ independent living).

Based on the information provided to date, the submission does not clearly establish these use-defining elements. This absence is significant, as it directly affects how the proposal should be evaluated for compliance with land-use definitions, policy intent, and infrastructure impacts. Approval should not be based on an assumed or incomplete characterization of the use.

6. Repeated refusal and continued non-alignment with adopted policy

This site has been reviewed repeatedly, and prior City decisions — including refusal by the Municipal Planning Commission and earlier Council decisions related to intensification — have consistently found this form of development inappropriate for this location. Continued appeals do not resolve the fundamental issue: this proposal does not align with the site’s adopted planning framework.

While East Lincoln Property has the right to develop land it owns, that right is not absolute and must conform to the City of Red Deer’s bylaws, statutory plans, and environmental policies. The continued pursuit of this proposal on a sensitive and constrained site does not address those policy conflicts.

For all of the above reasons, I respectfully request that the Subdivision and Development Appeal Board **uphold the Municipal Planning Commission's decision and refuse the appeal.**

Thank you for your consideration.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

Woodlea/Waskasoo neighbourhood

From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.com
Subject: [External] Fwd: Opposition to East Link Proposal near 4240-59St.
Date: January 19, 2026 10:11:51 AM

You don't often get email from [REDACTED] [Learn why this is important](#)

Subdivision and Appeal Board:

I am opposed to the East Link Proposal to build a large apartment building (apparently for independent seniors) between the Red Deer River and the Gateway School.

I am a citizen of Red Deer and frequently utilize the trail system, Gaetz Lakes Sanctuary and land near this proposal for hiking, wildlife viewing and lowering my blood pressure! The proposed development, and any further additional developments that could occur on these lands, will have an unacceptable impact on wildlife, including wildlife movements as well as stability of the River bank, sustainability of the quiet, wildlife and people friendly 45 St access to the Kerry Wood Nature Centre and McKenzie area and the general character of this quiet area.

This development is proposed in an area that has purposely and wisely been established as a relatively quiet area through the Waskasoo Environment Character Statement and the Waskasoo Area Redevelopment Plan to ensure future developments of the Public Service Zone respected the environment and fit in with the surrounding area.

In the recent past, Red Deer City Administration, made supportive living a discretionary use of PS lands. Although this discretionary use, seems very peculiar to me, **I want to ensure you that this discretionary use is not applicable to this site and the proposal must be rejected.**

Wildlife movement corridors between the school and the Red Deer River will be significantly impacted by both decreasing the land available and the useability of this area by wildlife. The stability of the Red Deer River bank, which is on the high energy outside bend of a might river in flood is always tenuous but will be under increased threat due to increased destabilization caused by a large construction proposal such as the proposed development. Then where would the access to the KWNC and area go? This proposal would also impact Waskasoo Park, the south bank trail which would go between the river and this proposal, the nearby Gaetz Lakes Sanctuary and

McKenzie Area, and the general character of this quiet area.

This proposal is not a fit for the land described. The impact is too large.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Subject: [External] East Lincoln Property appeal sdab 02620062025
Date: January 27, 2026 1:04:18 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

Gentlepersons: I, [REDACTED] together with [REDACTED] of [REDACTED] agree with the positions taken by the WCA, the RD Public school board, Waskasoo Environmental Education Society, the Gaetz Lake Sanctuary Committee and the Red Deer River Naturalists to uphold the MCP's refusal as applies to this "seniors apartment complex" as currently presented.

Signed, [REDACTED] January 27/ 2026

From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.info
Subject: [External] Appeal of Proposed East Lincoln Property Development – Protection of Waskasoo's Environmental and Historical Integrity
Date: January 25, 2026 6:37:35 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

To the City of Red Deer Appeal Board,

I am writing as a nearby resident of the Waskasoo neighbourhood to appeal the proposed three-storey, 48-unit seniors development by East Lincoln Properties. I respectfully ask that this project not be approved due to significant infrastructure and environmental concerns.

I recognise the property owner's right to pursue development, and this appeal is not meant to oppose housing or seniors living in our community. Rather, it reflects concern that this particular site is already under considerable strain and is not well-suited to the development of this scale.

The local road network is not designed to handle the additional traffic, parking demand, emergency access, and service vehicles associated with a 48-unit building. The road is not a curb-and-gutter roadway, and the area already experiences congestion due to nearby schools, community facilities, and heavy recreational use of the river valley. Parking is already limited and frequently over capacity.

The site is also located in an environmentally sensitive area near the Red Deer River Valley, Kerry Wood Nature Centre, and the Mackenzie Trails recreation area. These lands support wildlife movement, water quality, and groundwater recharge. Further development pressure will narrow wildlife corridors and negatively affect both animal habitat and the natural environment that residents value.

While the proposal may meet basic building and development requirements, meeting minimum standards does not necessarily mean this is the right location for this level of development. Both people and wildlife rely on this area, and preserving the historic and natural character of Waskasoo is very important to those of us who live here.

For these reasons, I respectfully request that the Appeal Board deny the proposed development.

Thank you for your time and consideration.

Sincerely,

[REDACTED]

From: [Jay Hallett](#)
To: [Appeals](#)
Cc: [Development](#); [Planning Services](#)
Subject: FW: [External] Appeal Number #SDAB 0262 006 2025
Date: January 19, 2026 3:03:49 PM

Please see below.

Kind Regards

Jay Hallett | Senior Development Officer

Permits & Inspections | The City of Red Deer

P 403.406.8690 | E jay.hallett@reddeer.ca

From: [REDACTED]
Sent: January 15, 2026 4:36 PM
To: Planning Services <Planning@reddeer.ca>
Subject: [External] Appeal Number #SDAB 0262 006 2025

Dear Sir/Madam

I am writing to express my opposition to the development of the apartment building at 4240 - 59 Street, between Gateway Christian School and the River.

I have written on numerous occasions that I oppose this development due to the fact that there is questionable adherence to the Waskasoo Neighborhood Plan and Waskasoo Character Statements. There are also numerous safety concerns in regard to traffic, City services and Emergency response times. The environmental and aesthetic impact of this building have not been addressed adequately, in my opinion. I am also concerned as to future development on this site, once the initial project is or is not completed.

Concerns regarding Waskasoo Neighborhood Plan and Waskasoo Character Statements:

In a response I received from Jay Hallet (Senior Development Officer) he said that the developer has added various architectural elements to meet the requirements of the Waskasoo Character Statements. From the drawings and schematics we have seen, I can see nothing that indicates anything has been done to make this building integrate architecturally with Waskasoo. I believe the building does NOT meet the roofline design nor height requirement of our Neighborhood. The building is essentially a giant shoe box, this does not fit into a neighborhood that is approximately 75 years old.

The present plan for this building does not conform with the setback of the school that is on the same street. This building needs to be relocated (moved back) so that it conforms with the rest of the street. This may result in being able to conserve the trees that are on this boulevard, rather than cutting them down.

As you are aware, parking is an immense problem because of the added traffic from the 3 schools and daycare in our neighborhood. At present, School Busses line up twice a day along 59 Street before and after the school day. I cannot imagine being a resident of this facility, when school buses are sitting mere meters away from your front door, while idling at the curb. Where will visitors to this seniors facility park once visitor parking at the complex is full? On street parking is at a premium, because of the schools. There simply is no room for extra cars to be parked on our neighborhood streets. I was quite dismayed at the attitude of the City Engineer at the MPC meeting on November 19, 2025. He treated our concerns about traffic and parking as a "minor inconvenience" and was quite dismissive of the issues we brought forward. It is NOT a minor inconvenience to be unable to leave your home twice a day for a half hour each time, due to excessive traffic and gridlocked roads.

Safety concerns - City Services and Emergency Services:

How will city services, such as power, water, sewage and gas be affected by the additional demand put on the existing system? Remember, this

neighborhood and its infrastructure are a minimum of 75 years old. In the Bowness area of Calgary, which has an older infrastructure, they have been experiencing power outages, water shortage, water pressure issues and sewer back ups, due to the increased demand on the system because of increased population density in the area. How will the City of Red Deer guarantee that residents of our neighborhood will not have to endure these types of interruptions in service?

Emergency Response Times: The City of Red Deer has supplied no information in regard to response times for Fire, Ambulance or EMT in Waskasoo. Twice a day our roads are grid locked for about a half hour each time. We have yet to hear how Emergency Services will respond in a timely manner to our homes. With the development of a seniors facility, there will be an increase in Emergency responses to this building as this is a statistically proven fact. Personally I have experienced on more than one occasion where it has taken me 30 to 40 minutes to access 55th Street, from my home. This is a matter of 3 blocks.

City Bylaws Enforcement: I am unable to understand why we NEVER see bylaws enforcement in our neighborhood during peak traffic and parking, on school days. It is fairly common to see them in the evening or on the weekends, but at no time do bylaw officers enforce parking or traffic restrictions during school times. Our neighborhood needs to have better coverage and more frequent visits by bylaw officers who will prevent blocked driveways, infringement of alleyways, parking in front of fire hydrants, infringement on crosswalks or speeding. I invite you to come to my neighborhood on any school day, when school is either starting or ending. You will see these violations occurring daily.

South Bank Trail System: The access to this development will cross the river bank trail system. This needs to be addressed in order to avoid possible accidents or infringement on the flow of pedestrian traffic and bicycles on the paths. There is also the aesthetic impact this will have on trails, just one more paved crossing to affect the pathways system.

Environmental and Aesthetic Impact:

The location and height of this building will dramatically affect the aesthetics and views from neighboring properties. The building will block the vista from the south side of 59th Street looking to the north. Homes located on this street have long enjoyed the open view to the north. Not only will this building impede the view but will also infringe on the privacy that people enjoy while in their yards. Views from the balconies will look down directly into peoples yards, robbing them of their privacy and peace of mind.

The area that is to be developed is directly under the migratory flight path for many birds that use the river valley. It is common to see pelicans, numerous varieties of geese, trumpeter swans, hummingbirds, ducks, eagles, hawks, falcons and various song birds in this area. This is also a major transit route for large mammals, such as deer, moose, coyotes, cougars, rabbits and various smaller rodents. This development will negatively affect the natural balance in this section of the river valley.

There appears to be no information made available in regard to underground water flow and drainage. What steps has the developer taken to ensure that the water table in the area will not be affected, especially since it is so close to the rivers' edge? It would be disastrous if this development were to increase or affect the natural erosion of this part of the riverbank.

Future Development:

Judging from the schematics and renderings that have been submitted to residents who will be impacted in our neighborhood, it would appear that the developer is leaving room for the development of more buildings, between 59th Street and the Red Deer River. I would vehemently object to further development on that parcel of land, as the impact would be extremely detrimental to our neighborhood and the river valley. The City of Red Deer and Waskasoo Residents needs to know what the developers intentions are for the future.

Sincerely yours,

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Subject: [External] East Lincoln Properties Appeal.
Date: January 20, 2026 11:56:01 AM

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I do not want a 48-unit seniors complex on the land between Gateway School and the Red Deer River. We have traffic control problems in this area now. Fix the traffic problem before you plan a bigger one.

Regards, [REDACTED]

From: [REDACTED]
To: [Appeals](#)
Subject: [External] Appeal number #SDAB 0262 006 2025
Date: January 26, 2026 12:58:29 PM

January 26, 2026

To: Subdivision and Appeal Board

RE: Appeal Number #SDAB 0262 006 2025

I am writing to express my **complete opposition** to the proposed Seniors Living Accommodation at 4240 59 Street, Red Deer. This application **does not conform** to the zoning bylaw, the Waskasoo Area Redevelopment Plan (ARP) and the ARP's Environmental Character Area and Character Statements. This development will drastically impact amenities shared by both the residents of Waskasoo and the entire city. Please uphold the unanimous decision by The Municipal Planning Commission to reject this proposed development. I have the following concerns regarding this application:

1. The corner of 59th Street and 45th Avenue is The Gateway to The Gaetz Lake Sanctuary, The Kerry Wood Nature Centre and McKenzie Ponds which makes it a very sacred piece of property. This proposed building is excessive in size and will impair/obstruct longstanding views of the river escarpments. I regularly walk along 59 Street and cannot imagine losing the magnificent views and feelings of openness and serenity. Many of us residents will be impacted. The present homeowners/tenants on the south side of 59th Street will be drastically impacted! They will lose their privacy as a result of the dozens of windows and balconies! Property values will plummet!

2. The Waskasoo Neighborhood is noted and admired for its unique character. This proposed building, in my opinion, is a "big ugly box" that does absolutely nothing to enhance our Waskasoo community character. It will stand out like a sore thumb!

3. The main streets of Waskasoo are already overburdened! Traffic on 45th Avenue is already 250 -350% overcapacity! As a result, our streets are dangerous! I regularly have a very difficult time turning onto Moore Crescent off of 45th Avenue - traffic is backed up behind me as drivers regularly turn onto 45th Avenue from 58 Street right in front of me! It should also be noted that as our Red Deer and area population increases, our wonderful amenities like McKenzie Ponds and The Kerry Wood Nature Centre are also becoming busier! This is what we want to happen but that also means more traffic! This is a fact worth noting.

4. This is Public Service land which means services should be provided. Realistically, with the only service being provided being a hair salon, the residents will be individual/couples who will be dependent on their car as there is not any public transportation. Each unit is self contained which means trips to the grocery store etc. As for proposed space available for home care, that is really grasping at the Supportive Living definition as anyone can access home care regardless of where they live!

5. Parking along 59th Street will be even more concerning. Presently there is no parking on 45th Avenue past 59th Street, no sidewalk on the south side of 59th Street and school buses park along the north side of 59th Street.

6. The proposed access road will be a hazard to the very busy trail system and 45th Avenue

7. This is a wildlife corridor and will definitely be impacted. In the past few years, the deer population has definitely increased which has created another hazard on 45th Avenue. A young deer was hit by a vehicle along 45th Avenue this winter!

I understand that East Lincoln Property Corporation owns this land but they need to respect and adhere to the Waskasoo Area Redevelopment Plan (ARP), the ARP's Environmental Character Area and Character Statements. The residents of Waskasoo are willing to work with them to create a development that enhances our wonderful neighborhood. Please respect the decision made by The Municipality Planning Commission on November 26, 2025.

Sincerely



Sent from my iPad

From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.com
Subject: [External] 59th Street Development Proposal - Letter
Date: January 20, 2026 11:03:35 AM

You don't often get email from [REDACTED] [Learn why this is important](#)

Attention: Subdivision and Appeal Board

East Lincoln Property has proposed a 3-storey seniors complex for their privately owned developable lot at 4240 59th Street. They have appealed the refusal of their development application by the Municipal Planning Commission.

I am directly impacted by this proposed development as a nearby resident of Clearview Ridge; I frequently use the adjacent trail systems in and around the Gaetz Lake Sanctuary and Waskasoo Park, and I frequently drive along the river route to the Kerry Wood Nature Centre. I am concerned about the impact of this multi-storey, high density development on the neighborhood, trail users and wildlife.

The proposed development is adjacent to several important recreation areas including the Red Deer River, the Waskasoo Park system and South Bank Trail, the Gaetz Lakes Sanctuary, Kerry Wood Nature Centre, and McKenzie Trails. A high density development will increase traffic and congestion en route to nearby playgrounds, trails and the Kerry Wood Nature Centre, which is currently an intentionally rural road winding slowly along the river. I agree with the Waskasoo Community Association that the proposed building "is excessive in form, height, and massing, will obstruct views and vistas from the road, and will negatively impact the mature street".

This area serves as an important buffer zone for migratory birds and other species. A multi-storey structure introduces noise pollution, light pollution, and increases the fatality risk for migratory birds accessing the Gaetz Lake Sanctuary and other adjacent green spaces. Environment Canada estimates that window collisions kill up to 42 million birds in Canada annually. The developer has not suggested mitigation such as reducing the structure height or using bird-friendly glass.

As a resident and frequent trail user, I believe that the best part of Red Deer is its park system. 4240 59th Street is an inappropriate location for a high density development.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Subject: [External] Appeal number SDAB 0262 006 2025
Date: January 21, 2026 10:48:51 AM

You don't often get email from [REDACTED] [Learn why this is important](#)

This email is a response to the proposed development by East Lincoln Properties (ELP) at 4240 59 street in Red Deer, and its appeal to the Red Deer Municipal Planning Commission's refusal of its application for the development at that location.

Before I address the specifics of my concerns regarding this development I would like to express my opinion on the development of this specific piece of land. Because of its location and the dynamics of the community I would hope that any development could be a win,win,win for the City of Red Deer, ELP and the residents of Waskasoo. ELP is expecting a return on investment as their "win". The City of Red Deer would and should expect the benefit (win) of the revenue from taxes received from the development. I don't see a "win" for the residents of Waskasoo with the current proposal,however I do understand that concessions should be made by all parties involved and I do not begrudge making some.

I will be affected by the development in several ways:

1) Traffic and street parking are already an outstanding issue and this development will adversely add to the existing problems. Waskasoo only has three access roads into and out of the community. None of which are through roads . All traffic into and out of the area must use one of these three roads and the majority use the direct route of 45 avenue. I live on 45 avenue and experience daily the excessive traffic volume on the road. With three schools located within two blocks of my residence the vehicle and bus traffic in the mornings and afternoons is already dangerous. 45 avenue is not wide enough to accommodate traffic as it is and adding a development that would increase this is unsuitable . Evenings and weekends are regularly even busier than the school hours traffic, with the Kerrywood Nature Center and McKenzie Trails Park access mainly on 45 ave. There are also City of Red Deer Yards near McKenzie Trails Park which require commercial and industrial traffic to use 45 ave daily. Even with the current traffic levels I feel access to the community for Emergency vehicles is adversely affected many times during the day.

2) I use the walking and biking trails adjacent to the river and the proposed development by ELP. The corner at 45 avenue and 59 street is already logistically a dangerous location for pedestrians,bikers and vehicle traffic. At the corner there is a termination of the paved trail along the river with a crosswalk requiring users to cross 45 ave east to west and vice versa. This crosswalk is located just north of the corner and requires traffic coming from the south to yield to pedestrians in a virtually blind location. At this same corner is a crosswalk on 59 street to cross at the corner for north south pedestrians . I have witnessed multiple close calls at this location between vehicles and pedestrians and have assisted in two injury collisions at the crosswalk. Adding more pedestrian traffic and more vehicle traffic to this area seems like a bad decision is a year round safety concern

3) My last comment regarding this development proposal is that "any" development at this location will affect the quality of living for current Waskasoo residents. I do however support and understand the development of properties in Red Deer to make it a better community for residents. I feel that once the initial 48 units were to be built, if approved ,the next proposal by

ELP would be to add an additional multi unit building to the west side of their property. Again the return on investment is the reason ELP purchased the land. More units means more revenue.

A couple of suggestions regarding my concerns and the knowledge that at some point there will be development on this land. I believe a two story building with the same footprint would reduce the added traffic and be more acceptable for the residents directly adjacent to the property on 59 street. No approval for a second building would make residents more willing to accept an initial development and possibly turning the building around so the front side is facing south and some upgraded landscaping to the south side would also make the 59 street more appealing than the back of the building.

Regards

A solid black rectangular box used to redact the signature of the sender.

From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.com
Subject: [External] Opposition to the proposed development in Waskasoo
Date: January 19, 2026 5:00:07 PM

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

To the members of the Subdivision and Appeal Board,

I am writing regarding the proposed development in Waskasoo at 4240-59 St. As a parent of two students currently attending Gateway School, and one more within the next couple years, I strongly oppose this development. Not only will the process of construction be disruptive for students, but the traffic is already horrendous on school days. I can't see how 45 Ave could accommodate the influx of traffic that would be inevitable with this project. Another practical concern is the question of where the school buses would park once the project is underway, since currently they drop off and pick up students along 59 St. I understand that this parcel of land is owned by East Lincoln Property, however, I do not believe this is the wisest choice considering the location.

Thank you for taking the time to hear my concerns, I'm sure I am just one voice of many who oppose this project!

All the best in your deliberating,

[REDACTED]



RED DEER RIVER NATURALISTS
BOX 785
RED DEER, AB. T4N 5H2

November 22, 2024

Re: Lack of Consultation for Changes to the Parks and Recreation and Public Service Zoning Bylaws

On Tuesday, November 19th the City finally released the Map of the new Park and Public Service Land Use Zones. Citizens have only until November 29th to respond to this very complex Bylaw Document.

This Date needs to be extended and full community consultation be facilitated so that citizens can respond.

What the RDRN Society finds terrifying about this Map is the proposed S-CG Zone (Service-Community Government) that surrounds the Kerry Wood Nature Centre from Parkland School to 67th Street. This land is currently zoned P1 or Park. Changing the zoning to S-CG will allow professional offices, supportive living accommodations, government buildings as permitted uses from lot line to lot line next to the Sanctuary, the Kerry Wood Nature Centre and the Red Deer River - which would totally impinge on the Gaetz Lake Sanctuary and wildlife movement to and from the River.

I have attached a Document from the planning of Waskasoo Park in 1981 on the need to expropriate the Glenmere Farm as a critical buffer between the Gaetz Lake Sanctuary and the Red Deer River. City Council supported expropriation in an 8 - 1 decision.

I have also attached the Gaetz Lake Sanctuary Committee's ecological impact assessment of the first East Lincoln proposal at the corner of 4220 - 59th street as a reminder.

Conclusion:

The rezoning of this important Park Land to Community and Government Service is just beyond belief: the core of Red Deer's contiguous, riparian jewel, the Gaetz Lake Sanctuary in Waskasoo Park would be totally compromised. This Administration and Council will be remembered as the people who frittered it away on the altar of development.

Rodjt

On behalf of the RDRN Board

HELP! Gaetz Lake Sanctuary in Danger Once Again

Glenmere Farm lies between Gaetz Lake Sanctuary and the river and includes a portion of the west lake and surrounding wet lands.

Having failed to gain consent of the owner to purchase the land in order to extend the sanctuary border and thus protect it from being landlocked from the river and also from the possibility of future housing or other development, the City of Red Deer has begun expropriation proceedings.

A court of inquiry was held in late April and its officer's findings were released this week. Quite astonishingly, in light of the evidence as we see it, the inquiry officer has reached the conclusion that only the lake itself plus a small set back should be expropriated by the city. He has passed this non-binding opinion on to the city. Maps comparing his position and the city's are enclosed.

The final decision must now be made by City Council. They may decide to expropriate the major part of the farm (leaving the farmhouse and yard for life-tenancy by Mrs. McCullough) or just a narrow band around the end of the lake plus an easement through a pasture for a path to the sanctuary.

The March meeting of the RDRN heard and drew unanimous support for the brief prepared by Maxine O'Riordan which detailed the need for expropriation of the whole of the farm land. A copy of her brief is attached as well as a synopsis of the points, endorsed by your executive, which outline why we feel the report of the inquiry officer is very much off base.

We invite you to examine these points and to consider using those you feel comfortable with in discussing and clarifying the issue when you speak with others. The city alderman's names and phone numbers follow in case you would like to express your opinion to one or more of them in regards to the action you feel is most appropriate for them to take.

Also, we would urge you to attend the City Council meeting on May 24th which will deal with the expropriation issue. The time that the issue will appear on the agenda is not known as yet, but may be around 4:30 p.m. Call the city clerk's office at 342-8111 on the 24th to check the time.

City Councilor's names and numbers are as follows:

Claybyn Hood	347-5926
Jack Kokotailo	347-6559 (away until May 24th)
Dan Lawrence	346-7345
Dennis Moffat	346-6443
John Oldring	347-2652
Larry Pimm	347-6093
Olly Webb	343-3121

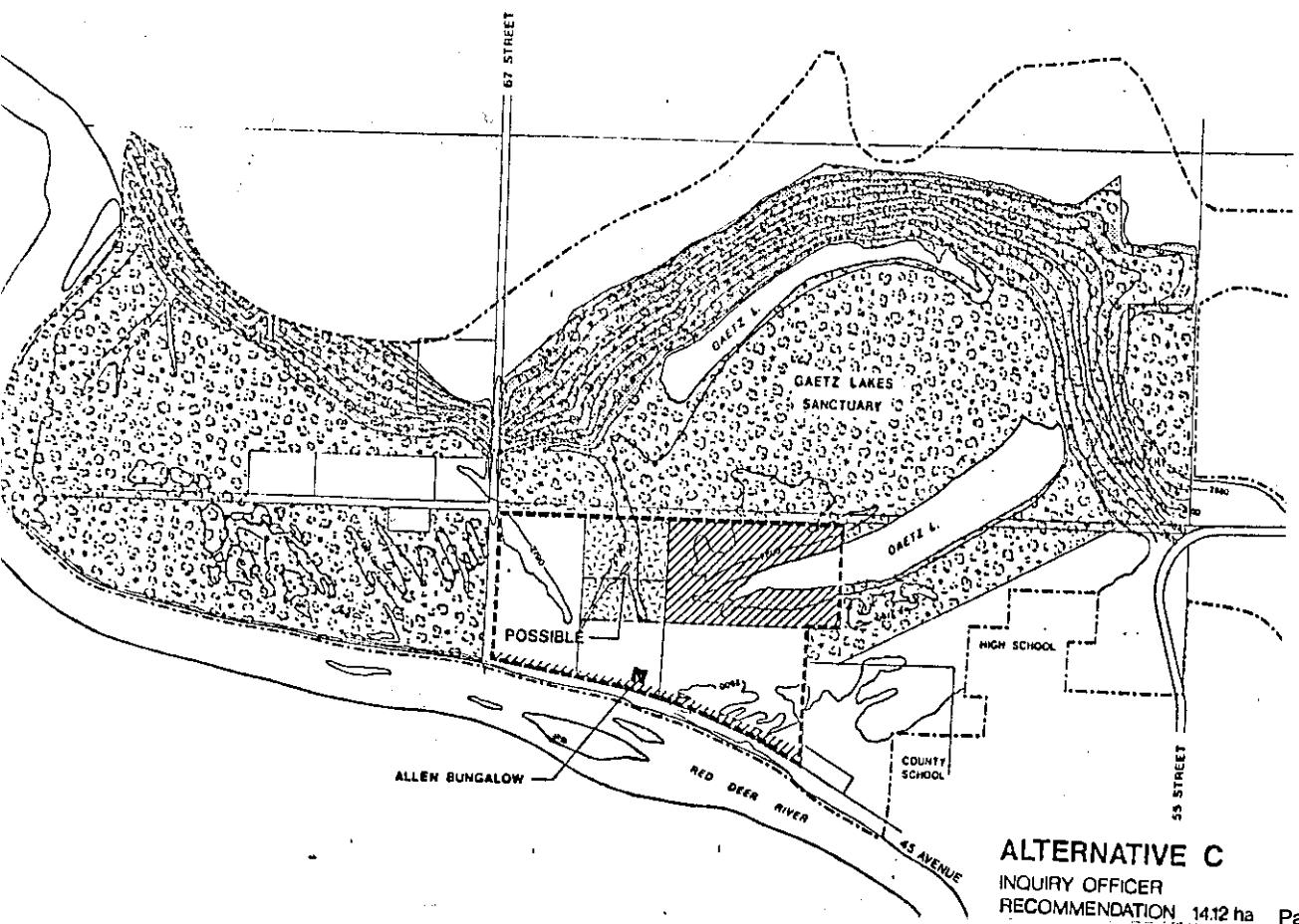
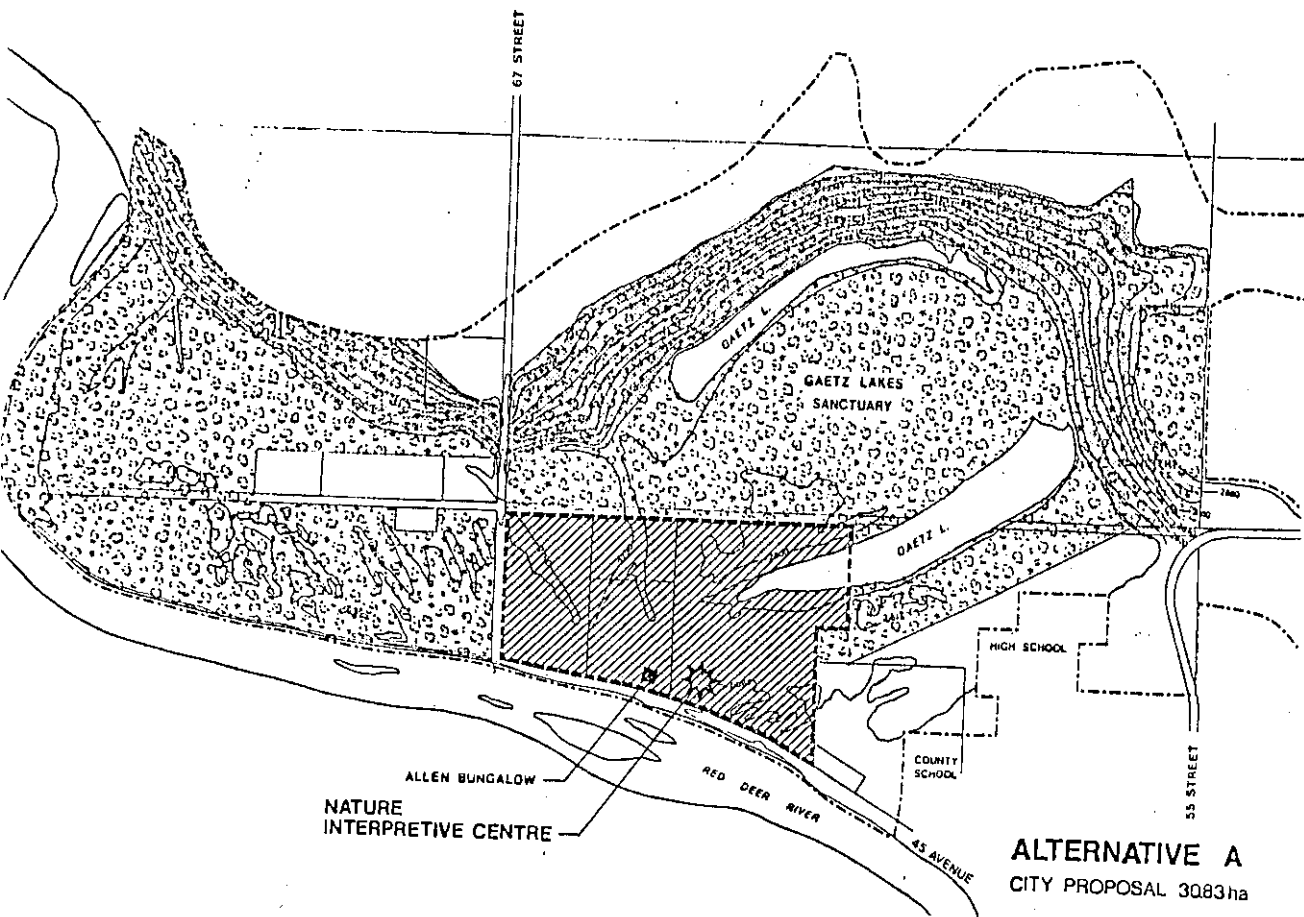
[REDACTED]
(for the RDRN Board)

Arguments in Support of Acquiring Glenmere Farms

- To prevent future development adjacent to the Gaetz Lakes. Even if no development is planned now, there would be no guarantee that it might not occur at some future date.
- The West Lake drains to the river across and under Glenmere Ltd.'s pasture area.
 - housing developments have a "roof top effect" that raise the area water table. This would slow the water circulation through the Gaetz Lakes and speed the death of the lakes.
 - a change in drainage patterns as a result of development on Glenmere Ltd.'s pastures could raise the lake levels and thereby diminish the area of "wet land" habitat that the majority of species of the sanctuary use.
- The protection of sensitive habitat around the lakes can only be guaranteed by restricting access; this would be virtually impossible to achieve should Glenmere Ltd. be developed.
- The Glenmere Ltd. pastures provide the open area necessary for a diversity of habitats which sustain the species variety found in and around the Gaetz Lakes.
- Wildlife moves by the most direct route between the river and the Gaetz Lakes. This route is across the Glenmere pastures. Therefore, an "access strip" as proposed by Glenmere Ltd. is insufficient.
- Although we have been assured underpasses will be provided, the development of the 67th St. road will limit northward wildlife movement making the Glenmere Ltd. pastures all the more critical for wildlife movement between the river and the sanctuary.
- Glenmere Ltd.'s pastures provide an essential buffer between people and the sensitive wet lands.
- Glenmere's pastures have "buffered" the sanctuary to the extent that wilderness birds such as loons and pileated woodpeckers are frequently observed there.
- Glenmere's pastures provide a durable area through which trails may be developed from which people could observe the more sensitive sanctuary areas.
- Insect eating birds prefer open meadow land to hunt in and over. Ground nesters, too, would use the pasture land if it was allowed to revert to a natural meadow state.
- A larger sanctuary area is more stable and less subject to damage through mischance or human intervention; the pasture areas are essential to the maintenance of the sanctuary.

- Glenmere and the Gaetz Lakes provide wintering areas connected to the river valley for deer; especially white tails.
- Glenmere is not and never can be a viable farming operation. Its area is small and its proximity to the Gaetz Lakes and the city preclude its use for an intensive animal operation. A market gardening operation would not be suitable because of the high probability of damaging the Gaetz Lakes from fertilizer and/or pesticide run-off.
- There are approximately 36 species of mammals which frequent the Glenmere/Gaetz Lakes areas.
- There are approximately 128 species of birds in this area. More of them would have suitable nesting and feeding areas in the sanctuary if the pasture area were allowed to revert to natural and protected meadow.
- Members of the RDRN have counted 86 different species of flowering plants in this area including many types of rare green orchids (Habenaria).
- The pastures, if allowed to, would revert to deciduous slough vegetation along the silt channels and the remainder of the pastures would likely revert to natural flora.
- Zoning is not a sufficient guarantee of the non-development of the Glenmere Farms. Zoning can be changed.
- The sanctuary is landlocked without Glenmere Farms Ltd.
- An interpretive centre proposed to be built on the Glenmere Farm would assure the presence of parks staff to police the sanctuary.

Detailed additional information can be obtained by borrowing a copy of the report prepared by the Waskasoo Park planners. Copies are available at the desk of the new Regional Planning Commission building at 2830 Bremner Ave., just south of the Advocate. Ask for "An Analysis of the Property Owned by Glenmere Farm Ltd."





RED DEER RIVER NATURALISTS

FORMERLY ALBERTA NATURAL HISTORY SOCIETY

P.O. BOX 785, RED DEER, ALBERTA, T4N 5H2

A Brief Submitted on Behalf of the
Red Deer River Naturalists

To whom it may concern:

For a very long time the area popularly known as Gaetz Lake Sanctuary has been of vital importance to the hearts and minds of the citizens of Red Deer. It is evident that each urban concentration requires a natural setting and the opportunity for its people to communicate with nature--to relax, learn, and enjoy. Without the richness, diversity and contrast of form, shape, and moods that nature provides, man's manufactured environment proves harsh and drab. Many threats to the Sanctuary's environmental integrity have arisen and each time the people replied--preserve the wilderness concept--keep it natural. Now Waskasoo Park has incorporated the area into an urban park and its future as a natural area is assured.

But the assurance of a viable habitat area is not so automatic. To maintain the ecological viability of such an area, certain conditions must be met. There must be diverse food sources, shelter, water and space, a degree of privacy for breeding and critical linkages to wider areas. There must be careful knowledgeable planning so that wildlife can continue to share our world with us, as is their right.

To meet these conditions we firmly believe that the property known as Glenmere Farms must be joined to Gaetz Lake Sanctuary. We believe that the Sanctuary is ecologically related to and dependant upon the adjoining farm.

The sanctuary and meadow lands, with the river and escarpment as natural boundaries, make an integral unit which we believe is the absolute minimum size to allow for the needs of wildlife. The larger "whole" will serve to provide an improved access or corridor to wider areas, a linkage which is critical.

The addition of the approximately sixty acres of meadowland would be invaluable for biological diversity and would add greatly ^{to the habitat types} in the unit. In nature, when a forest and lake area are present, it is vital that there be open areas nearby to complete the food chain. Many species would benefit. The meadowlark, fast vanishing from our land would thrive in the grassland. Bluebirds feed mainly on beetles and meadow insects, and many sparrows nest in the grass. It would be suitable and advisable to maintain and encourage the growth of native grasses as intensive agricultural use and urbanization in our province have made natural grasslands rare. The rodent population that would live in an enhanced meadow area would form interesting communities and be a vital link in the food supply of raptors, coyotes, or foxes. Perhaps a badger would find the area a suitable home to the delight of all.

Although the present use of Glenmere farms has probably not been detrimental to the Sanctuary, neither has it been supportive or particularly beneficial. The proximity of exotics and their wastes into an ecological benchmark area could lead to degradation of the water supply, and to the introduction of nuisance plants such as thistle and fox-tail. Any accidental invasion of the cattle into the inner areas would be most unfortunate. Also, if it should remain in private hands there is always a real possibility of a sale in the future to a completely incompatible and inappropriate user.

If Glenmere Farms were to become part of the Gaetz Lake unit, it would resolve the anomaly of the farm's property line extending into the west lake.

The west lake shore would then be more beneficial as a nesting area for goldeneye, bufflehead, grebes, and for red-winged blackbirds, and all the numerous denizens of water habitat.

One June 15, 1981, members of the Red Deer River Naturalists in one day counted eighty-six different species of flowering plants in the Sanctuary area. Species included five types of Habenaria or green orchids which are relatively rare. Thus, these areas are deemed to be sufficiently sensitive as a seed pool that great numbers of people should not walk among them. Therefore, the adjoining meadow land of Glenmere Farms would be crucial as a less sensitive area that would allow observation trails, viewpoints, and opportunities for groups such as school students to observe and study nature.

Similar pleas could be made for privacy and safety of nesting sites for birds. The great pileated woodpeckers and the common loon particularly both observed around Gaetz Lake are birds of the wilderness and their presence in our midst is a rather rare and valued event. By providing a buffer zone to the west they will become permanent residents. Mammals such as deer, fox, coyote, and wild mink have need of a sheltered habitat. Thus, the present farm land would provide an interpretive zone so that the depth of the forest could remain inviolate.

In conclusion, we would like to reiterate our assumption that to make the Sanctuary a viable habitat for the dozens of species observed, and to seek increased in their number and variety, it must be of a sufficient size to maintain a substantial food chain. The Gaetz Lake area has been increasingly surrounded, and its buffer zone reduced with housing subdivisions to the east and the deforesting and manicuring of the hill to the south, so a further loss to the west would be tragic. To encourage biological diversity, new habitat types, as an interpretive zone and a buffer zone Glenmere Farms would be a marvelous and

necessary adjunct. We are sure that future generations will appreciate and applaud the foresight of those who strove to preserve a priceless slice of nature within the confines of a bustling city.

December 12, 2022

To: Orlando Toews, Senior Planner

From: [REDACTED] Chair, Gaetz Lakes Sanctuary Committee

Re: Gaetz Lakes Sanctuary Committee response to the developer's request for feedback for the application to rezone 4240 59 Street from PS to R3, and to amend the *Waskasoo Area Redevelopment Plan (ARP)* to allow for the rezoning, to make optional the now required pre-development studies (geotechnical, bank stability, traffic, etc.) as well as to remove the property from its relevant character area.

While every developer believes they can sustainably alter the land for a housing development, the reality is that any alteration of the land will have negative effects on a myriad of environmental processes. Some of these alterations create challenges that rear their heads regardless of where the development takes place. Others are unique to 4240 59 Street.

Loss of Permeable Surfaces

While the existing schoolyard is not a natural environment, it is a permeable surface. Permeable surfaces allow for the slow, measured dissipation of rainwater and snowmelt by absorbing water, over a large area. This absorption prevents overland water flow and thereby reduces the opportunities for erosion.

Additionally, permeable surfaces allow for a measure of filtration. Rainwater and snowmelt can pick up a vast array of substances as it flows over the ground. Many of these - road salt and de-icing chemicals, oil and other lubricants, pesticides, and others - should not be flowing freely into our rivers and creeks. Permeable surfaces can act as a sort of pre-filter and reduce the load of these toxins in outflowing water.

By building on this land, the permeable surfaces are reduced. Building roofs, parking lots, driveways, and patios all act as physical barriers to permeable ground. These new hard surfaces concentrate water in a few locations and facilitate overland flow. This increased flow rate and volume increases the risk of erosion, placing the riverbank and riparian habitats at risk. Additionally, the increased overland flow loads the water with the previously mentioned substances and debris, carrying them to the river unabated and unfiltered.

Riverbank Stability

The Red Deer River has been increasingly threatened by development and subsequent erosion. There are numerous places along the river, through the city, where the bank has required armouring. The most visible examples are below Oriole Park West and below the houses along Cronquist Drive. Left to its own devices, the river would naturally erode the embankments creating natural cutbanks. The creation of these two neighbourhoods has necessitated the installation of the protection required to prevent the banks from eroding.

Bank armouring creates barriers to wildlife, removes potential spawning habitat, and interferes with the natural evolution of river systems. The proposed development is located on the outside of a bend in the river, as are the other two armored locations. Water flows faster at the outside of the bend, than at the inside. Our concern is that the development creates additional stresses on the riverbank, necessitating armouring. The extremely narrow nature of this habitat linkage heightens the importance of keeping native vegetation and riverbank function intact and unchallenged by development stresses.

Barriers to Wildlife

Corridor connectivity is critical to the protection of biodiversity. The Red Deer River is a regional artery of life, comprising nearly continuous riparian habitat along its banks from Fort Normandeau downstream to River Bend. Many organisms including plants, invertebrates, herptiles, mammals and birds move and thrive along this corridor. Perhaps one of the narrowest stretches of this corridor is along 45th Avenue – the site of this proposed development. This critical pinch point for the flow of biodiversity from south to north and east would certainly be impacted by the proposed development and the increased activity, traffic, impermeable surfacing, noise, lighting, and various other impacts that it would undoubtedly bring. Many of the wildlife species that presently move through this vital habitat linkage, especially the small ones that comprise the bulk biomass of biodiversity, are already at great risk due to the higher likelihood of roadkill that development would bring. Should development occur and traffic (foot and vehicle) increase, there would no doubt be greater impact. If anything, this narrow linkage should be widened and encouraged east to allow for the flow of biodiversity to and from the Gaetz Lakes Sanctuary and McKenzie Trails natural area. We support the current PS zoning and Open Space - Major long-term land use designation of the proposed development site as these designations support the health of the watershed, regional environment, and wildlife.

Trail Realignments

Depending on the design elements of a development, proposal trail connections may or may not be an increased threat. We would need to wait to see what the development proposal is before providing feedback on this element.

Increases in Traffic

Although this has already been touched on, with any increase in residential populations comes an increase in traffic, increased infrastructure, and development to accommodate that increased traffic, and an increased likelihood of wildlife/vehicle conflict. More cars equal more opportunity for negative interactions between wild animals and cars. Squirrels, foxes, deer, moose, weasels, chipmunks, beavers, hares, rabbits, snakes, salamanders all cross 45th Avenue on their way to the riverbank. As the number of cars increases, so does the possibility of animals being hit.

Increase in Pedestrian Traffic

Increased pedestrian traffic, especially with the extreme bottlenecking that we see along 45 Avenue, can also lead to more negative human/wildlife interactions. Increased foot traffic and everything that comes with it (light, noise, garbage, etc.) would restrict animal movement and potentially increase the number of vectors for invasive plant/species movement.

Light Pollution

Nocturnal and crepuscular (active at dawn and dusk) animals rely heavily on the dark for cover and concealment. Their vision is uniquely adapted to low light environments. Some animals rely on being able to see the night sky for navigation and wayfinding. Development lighting will create a barrier between the forest spaces around the perimeter and the feeding and watering areas (ponds, pond edges, shrubs, grasslands, riverbank, and river) located to the east and west of the property. Additionally, any lighting that is proposed along the escarpment will have similar effects on wildlife. The escarpment is a major wildlife corridor. Many deer, moose, foxes, coyotes, and birds rely on the cover of the riverbank forest for safe passage across to First Island. Lighting will be as effective at restricting nocturnal and crepuscular animal movement as would a physical fence. Artificial lighting also interferes with bird migration patterns; imagine the geese throughout Waskasoo Park never leaving.

We would recommend not installing lighting anywhere that crepuscular and nocturnal wildlife transit. The effect on wildlife movement would be too detrimental to justify its use. If lighting is absolutely required throughout the development, it should be well spaced with dark corridors between light pools. The dark spaces will create a path between the dark forest and the spaces beyond. Any lighting should be focussed on the trail (not spilling into the forest), downward firing, and shielded from above so as not to create light pollution in the night sky.

Invasive Plant Species

According to the Government of Alberta, 'invasive species' are "*non-native species that have been introduced, that threaten our ecosystems and biodiversity*" (AB Government definition, www.alberta.ca). To be classified as 'invasive,' a plant must cause harm to the other plants or organisms. Invasive plants can be harmful in many ways, such as by increasing in abundance so rapidly that they out-compete native varieties or by being poisonous to consume. These


invasive plants are often generalists, which means they are able to grow on many types of landscapes and often thrive in challenging conditions such as in roadsides or disturbed areas. These are introduced plants that are not native to the area in question. The Alberta government has determined various levels of classification when it comes to invasive plants: Noxious Weeds require control and Prohibited Noxious Weeds require eradication.

Several invasive plants currently exist in the area and disturbance caused by development would certainly open the way for greater establishment of these species. A greater presence of invasive plants on the landscape not only threatens the surrounding ecology but it also requires significant resources to control or eradicate and these efforts are often required for the long-term; issues do not go away easily.

The Gaetz Lakes Sanctuary is already under significant threat by invasive plant species. Canada thistle, Cicer's milkvetch, toadflax, black henbane, and scentless chamomile already present significant management challenges requiring significant time, financial, and logistical resources every year. Any development adjacent to the Sanctuary will only add to these challenges.

In conclusion, the Gaetz Lakes Sanctuary Committee does not offer support to this proposal for rezoning/developing the 4240 59 Street parcel, but rather, the committee stresses the importance of protecting, conserving, and enhancing this vital ecological landscape linkage. Intact wildlife movement corridors, undisturbed soil structure and thriving plant and animal communities are a few of the vital elements that help to keep our urban ecosystems healthy and resilient.

Respectfully submitted,

A large black rectangular redaction box covering the signature of the committee chair.
Chair, Gaetz Lakes Sanctuary Committee

January 22, 2026

Red Deer Subdivision and Development Appeals Board
City of Red Deer
4914 48 Ave
Red Deer, Alberta
T4N 3T4

Re: #SDAB 0262 006 2025

To Whom it May Concern,

The Waskasoo Environmental Education Society (WEES) operates the Kerry Wood Nature Centre, the Gaetz Lakes Sanctuary, the Allen Bungalow, and Historic Fort Normandeau via an Operating Agreement with The City of Red Deer. WEES is also responsible for personal and non-personal interpretation throughout the Waskasoo Park System's trails and park nodes.

While not directly notified of the application for a Development Permit by East Lincoln Properties for the lot at 4240 59 St, WEES has an interest in commenting on the impacts of the development as they relate to the environmental impact, and contravention of the Waskasoo Area Redevelopment Plan (ARP). To date we have commented on this project, the rezoning application, and the development permits, at every stage. We have consistently put forward the position that the development is environmentally unsuitable for both the piece of land in question, and for the Federally-protected Gaetz Lakes Sanctuary, located adjacent to the property.

The Sanctuary has benefited from Federal protection through the Canadian Wildlife Service for 101 years, and from The City's oversight and WEES's management since the early 1980s. The Sanctuary's importance to local wildlife, birds, environmental processes, and biodiversity in Red Deer, cannot be overstated. Any development on the parcel of land in question, will have negative consequences for The Sanctuary.

Regarding the Sanctuary and the surrounding spaces, WEES's role is to act as the managers, stewards, and protectors of the Gaetz Lakes Sanctuary; the 118 hectare Federal Migratory Bird Sanctuary. The Sanctuary is located adjacent to the Gateway Christian School property and the parcel of land at 45 Ave and 59 St that is currently facing redevelopment.

Additionally, we provide expertise on wildlife, nature, and ecological matters to members of the public, City staff, and Council.

Our comments regarding the current development permit application and its impacts are formed by these dual roles.

Our concerns are specifically related to the proposed development of the aforementioned property, as presented to the Waskasoo Community Association (WCA). We thank the WCA for bringing this matter to our attention.

The proposed Lincoln Developments project is fraught with negative environmental impacts. It also appears to run counter to sections of the Waskasoo ARP.

The case laid out below was made in December 2022, January 2025, and November 2025. We are presenting here, as those potential impacts remain. We are also including our most recent argument, outlining areas where we feel the development contravenes the Waskasoo ARP.

Waskasoo Area Restructuring Plan (ARP) Requirements

Section 5 of the Waskasoo ARP deals with the Waskasoo Environmental Character Statement. As per the ARP (page 12) "Where the regulations in the *Land Use Bylaw* or the *Redevelopment Guidelines* conflict with the Character Statements, the Character Statements shall prevail".

n.b. The word "shall" is defined such that compliance is required.

5.3 Common Features and Scale of Buildings

- Natural features including native vegetation, mature trees, and a minimal Building coverage.
- Buildings typically 1 story with flat roof construction.

Nothing in the development permit application honours this section. Mature trees are slated for removal, there is no mention of native vegetation, and the building coverage (a massed, 3-storey building) will be extensive.

5.5 Other Common Elements

- Rural character with native, naturalised landscapes, rural road cross sections, a lack of fencing.
- A wide open sense of space that is not common in other areas of the City.

The proposed development is a modern, aluminium and hardie board structure with slab sides. The landscaping is neither native nor naturalised, and there will be fencing

installed. The wide open space that currently exists - and is seen as a benefit - will be lost to the scale of the development.

5.6 Recommended Design Elements

- 5.6.2 mature street character, scenic Vistas (*sic*) viewable from the road, and existing natural features of the area shall be maintained.
 - *The views of the Sanctuary and the river will be negatively impacted by the 3-storey building. Likewise the entire development plan will negatively impact the natural features of the area; native vegetation, wildlife corridors, riverbank access for wildlife will all suffer.*
- 5.6.9 All roads north of 59th Street within the character area should maintain their natural boundaries and native vegetation to preserve and enhance the wildlife corridor through this critical area adjacent to the Red Deer River.
 - *This entire project places that wildlife corridor at risk. Animals will be forced out to roadways or pinned into unsuitable, developed spaces. By damaging this part of the wildlife corridor, East Lincoln is placing wildlife at greater risk of negative outcomes, and restricting wildlife's access to food and movement through the animals' natural habitat.*
- 5.6.11 Disruption of any open space proposed to be disturbed during construction or otherwise not preserved in its natural state shall be shown on development plans and shall be restored with vegetation that is compatible with the natural characteristics of the site.
 - *The natural drainage provided by the permeable surfaces that currently exist will not be replaced or replanted. In fact there is no mention of the loss of this natural feature. There is no plan to replicate the loss of this important ecosystem service. Likewise, a raspberry garden does not constitute "vegetation that is compatible with the natural characteristics of the site".*
- 5.6.15 New development should not adversely affect the character of the streetscape, as a result of being sited too close to the road, of inappropriate Massing (*sic*), for or height having a negative impact on abutting properties in terms of shadows and privacy/over look, or causing the loss of landscape features of other factors which may have a negative effect of the streetscape or abutting properties.
 - *A three-storey, slab-sided building such as the one proposed by definition, runs counter this character statement.*
 - *It will create shadows and steal sunlight from children playing on the adjacent school grounds.*
 - *It will create overlooks into neighbouring yards and into the schoolyard.*

- *It will create increased air pollution from increased vehicle traffic, creating a health hazard to children.*
 - *Its proximity to the sidewalk will potentially create a hazard to children walking to and from cars/school.*
 - *It will negatively impact wildlife and bird populations that current Waskasoo residents enjoy.*
 - *The amount of traffic this development will generate will overload the already crowded streets.*
- 5.6.16 Location, style, and amount of fencing proposed around and/or adjacent to open spaces shall have consideration for the movement of wildlife, and the prevention of opportunities for wildlife entrapment.
 - *According to the Site/Context Plan the entire site is to be enclosed by a chainlink fence. This runs counter to the character statement as there has been no consideration for the movement of wildlife. As previously mentioned in this comment document, the fencing will not only entrap wildlife, it will also force wildlife out onto roadways, or prevent them from accessing the natural wildlife corridor.*
- 5.6.17 In order to reduce ambient light levels which will reduce the impact of light on nocturnal environments , exterior lighting on Buildings (*sic*) or within yards should be pointed down, particularly near the Sanctuary.
 - *While the developer does mention that they will be installing dark skies-friendly lighting on the building exterior, they have not taken into account the volume of light created by individual units. The potential for light spill from interior lighting is significant. This can cause nocturnal and crepuscular animals to fly into window panes, be more susceptible to predation, choose less safe routes to traverse the landscape, and/or be attracted to humans and anything that may be on individual unit's decks. This in turn increases the chance of disease transmission, food dependence, and negative human/wildlife interactions.*

WEES also noted that while the current development permit application is for a development of *one* building, the geotechnical documentation included with East Lincoln's application clearly shows a second building running north/south along 45 Ave. This second building will create additional adverse effects for the residents and the school children. It will completely block the view of the river, block the setting sun (especially during the shorter days that make up the bulk of the school year), and contribute to the loss of landscape features. The combination of the two buildings exacerbate the effects that violating section 5.6 of the ARP seeks to avoid.

Environmental and Sanctuary Concerns

Loss of Permeable Surfaces

While the existing schoolyard is not a natural environment, it is a permeable surface. Permeable surfaces allow for the slow, measured dissipation of rainwater and snowmelt by absorbing water, over a large area. This absorption prevents overland water flow and thereby reduces the opportunities for erosion.

Additionally, the permeable surfaces allow for a measure of filtration. Rainwater and snowmelt can pick up a vast array of substances as it flows over the ground. Many of these — road salt and de-icing chemicals, oil and other lubricants, pesticides and others — should not be flowing freely into our rivers and creeks. Permeable surfaces can act as a sort of pre-filter and reduce the load of these toxins in outflowing water.

By building on this land, the permeable surfaces are reduced. Building roofs, parking lots, driveways, and patios all act as physical barriers to permeable ground. These new hard surfaces concentrate water in a few locations and facilitate overland flow. This increased flow rate and volume increases the risk of erosion, placing the riverbank and riparian habitats at risk. Additionally, the increased overland flow loads the water with the previously-mentioned substances and debris, carrying them to the river unabated and unfiltered.

There is no substitute for natural, permeable surfaces over large areas. Rainwater catchment, and planter boxes can help, but they lack the depth and breadth of open permeable land. It is this depth and breadth that protects surrounding land from erosion, and reduces the impacts of surface pollutants.

Riverbank Stability

The Red Deer River has been increasingly threatened by development and subsequent erosion. There are numerous places along the river, through the City, where the bank has required armouring. The most visible examples are below Oriole Park West and below the houses along Cronquist Drive. Left to its own devices, the river would naturally erode the embankments creating natural cutbanks. The creation of these two neighbourhoods has necessitated the installation of the protection required to prevent the banks from eroding.

The bank armouring creates barriers to wildlife, removes potential spawning habitat, and interferes with the natural evolution of river systems. The proposed development is located on the outside of a bend in the river, as are the other two armoured locations. Water flows faster at the outside of the bend, than at the inside. Our concern is that the development would create additional stresses on the riverbank, necessitating armouring. The extremely narrow nature of this habitat linkage heightens the importance of keeping native vegetation and riverbank function intact and unchallenged by development stresses.

Barriers to Wildlife

Corridor connectivity is critical to the protection of biodiversity. The Red Deer River is a regional artery of life, comprising nearly continuous riparian habitat along its banks from Fort Normandeau down stream to River Bend. Many organisms including plants, invertebrates, herptiles, mammals and birds move and thrive along this corridor.

Perhaps one of the narrowest stretches of this corridor is along 45th Avenue, right at the site of this proposed development. This critical pinch point for the flow of biodiversity from south to north and east to west would certainly be impacted by the proposed development and the increased activity, traffic, impermeable surfacing, noise, lighting and various other impacts that it would undoubtedly bring.

Many of the wildlife species that presently move through this vital habitat linkage, especially the small ones that comprise the bulk biomass of biodiversity, are already at great risk due to the higher likelihood of roadkill that development would bring. Should development occur and traffic (foot and vehicle) increase there would doubtless be a greatly detrimental impact on biodiversity.

If anything this narrow linkage should be widened and encouraged east to allow for the flow of biodiversity to and from the Gaetz Lakes Sanctuary and MacKenzie Trails natural area. Major long-term land protection and habitat-rewilding on the proposed development site would support the health of the watershed, regional environment, and wildlife. Placing a large, massed structure on this site will be detrimental to local wildlife and birds that depend on the Gaetz Lakes Sanctuary, the riverbank, and the spaces between them.

Trail realignments

Looking at the Site/Context Plan it is clear that the existing South Bank Trail will be intersected by another driveway. It cannot be understated that this section of trail is extremely well-used by pedestrians, cyclists, scooter-riders, and skateboarders. Neighbourhood residents out walking their dogs, commuters headed into and out of downtown for work, and children heading to and from school all make use of this section of trail. These users already have to contend with the driveway that serves Parkland CLASS and Gateway School. A second driveway is going to drastically increase the chance of negative human/automobile interactions. This is an insurmountable problem as there is no space to realign the trail to avoid this driveway crossing.

Increases in Traffic

Although this has already been touched on, with any increase in residential populations comes an increase in traffic, increased infrastructure and development to accommodate that increased traffic, and an increased likelihood of wildlife/vehicle conflict. More cars equals more opportunity for negative interactions between wild animals and cars. Moose, foxes, deer, squirrels, weasels, chipmunks, beavers, hares,

rabbits, snakes, salamanders all cross 45 Ave on their way to the riverbank. As the number of cars increases so does the possibility of animals being hit.

WEES is concerned with human welfare as well as with wildlife welfare. As regular users of 45 Ave at peak times, we can see that Red Deer Emergency Services (RDES) would be significantly delayed should a medical or fire emergency happen at the proposed facility, during those peak hours. The proposed new population of people would be at increased risk of distress and increased reliance on RDES, in an area with poor access for emergency vehicles.

Increase in Pedestrian Traffic

Increased pedestrian traffic, especially now that it would be bottlenecked, can also lead to increases in negative human/wildlife interactions. Increased foot traffic and everything that comes with it (light, noise, garbage, etc) would restrict animal movement and potentially provide increased vectors of invasive plant/species movement.

Light Pollution

Nocturnal and crepuscular (active at dawn and dusk) animals rely heavily on the dark for cover and concealment. Their vision is uniquely adapted to low light environments. Some animals rely on being able to see the night sky for navigation and wayfinding. Perimeter lighting will create a barrier between the forest spaces around the perimeter and the feeding and watering areas (ponds, pond edges, shrubs) located in the point bar. Additionally the lighting that is proposed along the escarpment will have similar effects on wildlife. The escarpment is a major wildlife corridor. Many deer, moose, foxes, coyotes, and birds rely on the cover of the riverbank forest for safe passage across to First Island. Lighting will be as effective at restricting nocturnal and crepuscular animal movement, as would a physical fence. Artificial lighting also interferes with bird migration patterns; imagine the geese at River Bend never leaving.

A facility of this size will generate a tremendous amount of light, regardless of a dark skies lighting plan. Residents' own unit lighting will not be shaded or downward-firing. This alone will create an increased light-pollution situation.

Invasive Plant Species

To be classified as 'invasive,' a plant must cause harm to the other plants or organisms. Invasive plants can be harmful in many ways, such as by increasing in abundance so rapidly that they out-compete native varieties, or perhaps by being poisonous to consume. These plants are often generalists, which means they are able to grow on many types of landscapes and often thrive in challenging conditions such as in roadsides or disturbed areas. These invasive plants are by definition introduced plants that are not native to the area in question. The AB Government has determined various levels of classification when it comes to invasive plants: Noxious Weeds require control and Prohibited Noxious Weeds require eradication.

Despite best education efforts, housing often brings along invasive plant species. These plants have a tremendous impact on the Sanctuary.

WEES spends several thousand dollars every year, controlling invasive plant species in the Sanctuary. The cost of hand-pulling, spraying with vinegar and salt, and hiring a flock of goats runs to roughly \$24,000. A development of the type permitted under proposed rezoning would undermine our decades of efforts in the Sanctuary, potentially exposing it to increased invasive seed dispersal.

Several invasive plants currently exist in the area and disturbance caused by development would certainly open the way for greater establishment of these species and the negative impact to the landscape that this would cause. Undisturbed soil structure and thriving native plant communities are important elements of healthy and resilient ecosystems.

In the letter sent by The City to residents and stakeholders on October 27, the developer did not address any concerns brought forward by the WEES, the Gaetz Lakes Sanctuary Committee, the RDRN, nor any of the other critics of this development. Rather they have played with some language in the attempt to move the project ahead.

Taking a wider view, WEES supports the citizens and organizations concerned with what the proposed development could mean to Red Deer's park and wild spaces. For 40 years Red Deerians have enjoyed the peace and tranquility of the natural spaces afforded by the Waskasoo Park system and the connecting natural areas. The facilities that currently exist in other park nodes have met citizens' needs since their inception.

WEES is concerned that should this development be approved, other future projects adjacent to Red Deer's natural areas would have precedence to lean on; other undeveloped areas would potentially face similar development threats. WEES holds the position that some natural spaces need to remain natural. The piece of land at 45 Ave and 59 Street is one of those spaces where the value and importance to the environment is greater than any proposed building development.

Thank you for considering this feedback. In addition WEES would point to and support the excellent comments and feedback provided by the Waskasoo Community Association and Red Deer River Naturalists. It is WEES's hope that this

decision will be made with a conservation mindset of protecting the fragile riparian wildlife corridor and biodiversity linkage of the proposed development area.

We welcome the chance to walk the property, surrounding area, and the Sanctuary; and to have a frank discussion about the potential damage to the Sanctuary, to wildlife, to the river and its role as a wildlife corridor, and to the greater ecological systems and services at large.

Sincerely,

[REDACTED]

[REDACTED]

Board Chair

Waskasoo Environmental Education Society

cc: Waskasoo Community Association
Red Deer River Naturalists
Gaetz Lakes Sanctuary Committee
[REDACTED] ED, Waskasoo Environmental Education Society



**SUBMISSION TO THE
RED DEER SUBDIVISION AND DEVELOPMENT APPEAL BOARD
RE: DEVELOPMENT PERMIT APPLICATION FOR 4240 59 ST.**

Introduction

The Board of the Woodlea Community Association wishes to make a brief submission regarding the above Development Permit Appeal.

While we appreciate that there is a case to be made for multi-storey residential buildings as a means of achieving greater density within the city, we support the general thrust of the thoughtful submissions made by the Waskasoo Community Association, and (earlier, to the Municipal Planning Commission) the Red Deer River Naturalists, the Gaetz Lakes Sanctuary Committee, and the Waskasoo Environmental Education Society in suggesting that, as it is currently proposed, this is not the right development for this particular piece of land.

As explained below, we believe that the Municipal Planning Commission made the right decision in rejecting the application, and they made it for the right reasons; we urge the Subdivision and Development Appeal Board to uphold that decision.

The Woodlea Community Association's Standing before the SDAB

Before highlighting our concerns, we would like to provide some context for our interest in this issue. Woodlea lies immediately south of Waskasoo, between 55th St. on the north, Ross St. on the south, Michener Hill on the east, and Waskasoo Creek on the west; 45th Ave, on which the lot in question is located, runs through our community (and is likely to see an increased volume of traffic if the development goes ahead). Like Waskasoo, we are one of only three historic Red Deer communities, and also like Waskasoo, we worked with the City of Red Deer a number of years ago to develop a set of Character Statements to help guide development in our neighbourhood—Character Statements that are included as part of the Zoning Bylaw. If the Waskasoo Character Statements are ignored or minimised in this instance, then we in Woodlea will have no confidence that our Character Statements will be respected in any future development decisions in our neighbourhood.

Character Statements

Our main concern, to use the words of Waskasoo's submission to MPC, is that the proposed development **"does not meet many of the regulations laid out in the Zoning bylaws and Environmental Character Statements including shall and should statements involving views and vistas, mature street character, character area character, tree preservation, fencing, permeable surfacing, and preserving the natural road boundary."** Without trying to repeat the detailed arguments here, we support this serious objection as it applies to Waskasoo. But also, as noted above, given that Woodlea, too, has Character Statements in place to guide development, we would be very concerned if a development were approved that did not respect Character Statements in this case. In our view, that would tend to undermine all Character Statements generally, not just in Waskasoo. These documents are the result of considerable work and extensive discussions between the communities and the City; not

giving them weight in this decision would tend to undermine trust and erode goodwill. *It is also crucially important to recognise that, where they exist and are incorporated into the Zoning Bylaw by way of appendices, they are legitimate and fully enforceable parts of the bylaw, just as if they were incorporated into the body.*

Municipal Planning Commission Deliberations and Decision

The minutes of the November Municipal Planning Commission meeting indicate that the members understood the importance of this issue in making their decision. Most importantly, in the summary explanation given for rejecting the application (point 4), the minutes note, ***“The Municipal Planning Commission gave weight to the Waskasoo Character Statements when determining this decision to reject the development proposal”*** (emphasis added).

Points prior to this in the minutes give more specific reasons, as follows:

“1. The development’s proposed built form and orientation is not conducive nor compatible to the interface of the existing community including nearby residences ***pursuant to 5.6(1) of the Waskasoo Character Statements***” (emphasis added).

“2. The proposed development . . . ***does [not] meet the requirement of the Waskasoo ARP.*** The development should be compatible in scale, sensitive in design and ***aligned with the community vision***” (emphasis added).

“3. New development should not adversely affect the character of the streetscape ***pursuant to the 5.6(15) of the Waskasoo Character Statements*** . . . ” (emphasis added).

As noted in our introduction, in our view, the Municipal Planning Commission made the right decision on this application, on the right grounds. At this point we look to the Subdivision and Development Appeal Board to confirm the crucial importance of ARP’s and Character Statements in guiding future development in older neighbourhoods by upholding the MPC decision.

Other Issues

Beyond this issue of Character Statements, we would like to comment on two other issues raised by the Waskasoo Community Association and which have relevance for our neighbours in Woodlea.

1. **“It will unduly interfere with area amenities including views and vistas, trails, traffic, pedestrian safety, and the environment.”** Like residents of Waskasoo, many people choose to live in Woodlea because of its proximity to the parks and trail system, and they use the trails regularly, including those that lead out to the Kerry Wood Nature Centre, the Gaetz Lakes Sanctuary, and Mackenzie Trails. Anything that may work to the detriment of the physical environment and ecosystem, as explained by the Red Deer River Naturalists, the Gaetz Lakes Sanctuary Committee, the Waskasoo Environmental Education Society, and the Waskasoo Community Association—or to people’s ability to enjoy the environment—is a significant concern.

2. **“It will materially interfere and affect the use, enjoyment and very possibly the value of neighbouring properties because of siting and overlook.”** Siting of new developments and the overlook that they may create into adjacent homes and yards have been major concerns for many residents of Woodlea during discussions of development over the past ten years;

people have expressed concerns about loss of privacy and interference with enjoyment of property. So we understand and support the position taken by the Waskasoo Board—including the idea that poor siting and excessive overlook may well negatively affect property values. To the extent that siting and overlook are dealt with in the Zoning Bylaw and the Character Statements, we believe that it is extremely important to observe those protections.

For the reasons outlined above, we urge the Subdivision and Development Appeal Board to reject the appeal of the decision of the Municipal Planning Commission with respect to this development permit application.

Yours sincerely,

, Chair
Community Association Board

January 27th, 2026

To: <appeals@reddeer.ca>

Mayor, Cindy Jefferies, mayor@reddeer.ca

Tara Lodewyk, City Manager, tara.lodewyk@reddeer.ca

Re: #SDAB 0262 006 2025

Dear Members of the Subdivision and Appeal Board:

I moved to Red Deer in 1977 to attend Red Deer College. After a couple of years of mixed results, I was swept up into the Oil and Gas Service Industry with Dowell: 15 on / 5 off, 24 hr call. Of course, you could not plan a date never mind get involved in the community. However, my roommate and I always subscribed the Red Deer Advocate so we would read about the Red Deer River Naturalists and the development of Waskasoo Park. Ironically, as so many were losing everything in 1982, I received excellent training over the next two years and in 1984 was promoted to being the first Supervisor of Recruiting and Training for Dowell Schlumberger Canada *centred* out of the head office in Calgary. Managers in the 11 Canadian Regions were not allowed to hire. Once that ended after three months having hired 40 people (engineers, petroleum tech graduates, equipment operators, truck drivers, secretarial staff, computer programmers and so on), DS restructured. I was transferred back to the field in Loyd. I hung in there for six months and resigned.

Later working for the Red Deer Museums Management Board out of the Red Deer Museum and Archives starting in 1986, Waskasoo Park officially opened. It was an exciting time. I came to know very well the members of RDRN who not only made serious ecological submissions about every node of the park but walked with the planners designing shale pedestrian trails and paved bike trails to mitigate damage to the forested areas from 1981 to 1985. Another edited signage. RDRN advocated for the expropriation of the Glenmere Dairy Farm as a buffer in the “onion skin” approach to environmental protection. This was considered critical. RDRN was not going to miss the opportunity to have a Nature Centre as a guardian an educational sentinel; that sunny Heritage Day, 1986 was such a gratifying day when it opened. Waskasoo Park received several awards including national awards not just for the planning process but for the park. Red Deer’s population was 52,000.

As most of you must know, it was RDRN and its predecessor organization the Alberta Natural History Society led by Kerry Wood and his friends who had been the stewards of the Gaetz Lake Sanctuary for over a century. Until it was officially donated and designated a Federal Migratory Bird Sanctuary in 1924, John Jost and Catherine Gaetz had looked after it and shared it with the community for over 140 years now.

. . . 2

So here we are: a development proposal purchased as Public Service (PS) land. The Sanctuary is full of wildlife as the cameras installed by Red Deer Polytechnic students and drone footage makes very apparent in inventories that have been done. Not just ungulates (Moose and Deer) but smaller mammals and other animals that the Kerry Wood Nature Centre refrains from sending News Releases about.

Many animals and birds move at night between the Sanctuary and the River move early in the morning or in the evening. Parkland School is open from 8:00 – 5:00 ish, 5 days a week. Gateway Chistian would be similar other than for events. This proposed development is 24 / 7. The light is a much bigger issue. As far as traffic on this increasingly busy path and rural road bisected by this development with 53 parking spots will have much greater impact.

I am a volunteer member of the Gaetz Lake Sanctuary Committee for the past five years and I obviously support their ecological impact study. That Link is below.

Your truly,



RDRN Board Member

Member, Gaetz Lake Sanctuary Committee

<https://mail.google.com/mail/u/0?ui=2&ik=d1773056e0&attid=0.1&permmsgid=msg-f:1848172417476263084&th=19a607058b58fcac&view=att&zw&disp=inlineWaskasoo>

To the Subdivision and Appeal Board,

As an owner of a residence on 45 Ave in Waskasoo, I came aware of the fact that East Lincoln Property has submitted a development permit application for their lot at 4240 59 St. It consists of a 3- storey, 48-unit seniors supportive living apartment building located on 59 St.

As an integral part of preparing the Waskasoo Neighborhood Plan was determining a vision for the community. A community identity workshop was hosted on May 8, 2014 at the Streams Christian Church where Waskasoo landowners, residents and stakeholders worked together to find a common vision for the Waskasoo Neighbourhood Plan. The following community vision was established:

“Waskasoo is a neighbourhood of trees and trails, rivers, and creeks, beautiful old homes and great schools. Our diverse community values and shares a wealth of natural, artistic, and historical riches.”

The Municipal Government Act requires identification of the Area Redevelopment Plan objectives. These objectives are established to achieve the community vision by forming the basis for the policies contained within. As Waskasoo redevelops and evolves throughout time, the Area Redevelopment Plan is set out to accomplish the following objectives.

1. Ensure development and redevelopment of properties is sensitive to the existing neighbourhood character and pattern of development created by street design, lot sizes and distribution, mix of uses and general density of development.
2. Maintain Waskasoo's extensive parks and open space.
3. Preserve and maintain environmental, historical, and cultural features.
4. Maintain and enhance trail and pedestrian connections
5. Encourage the enhancement and maintenance of all properties.

The submitted development permit application by ELP for their lot at 4240 59 St. is not sensitive to the existing neighbourhood character and lot sizes and general density of development. (objective 1).

Furthermore, the proposed development clearly effects Waskasoo's extensive parks and open space. (Objective 2)

A 3-storey building containing 48 units and 52 parking stalls are in contrast of preservation and maintaining environmental, historical, and cultural features. (objective 3).

Because there's no parking along 45th Ave and past 59th St, no sidewalk along the south side of 59th St., and Gateway's busses park on the north side of 59th St., overflow parking will be pushed onto other side streets. As frustrating as this already is, the consideration of the safety for students and the children that play at the playgrounds located close to this area and only have access walking or driving through. It's also the start of a walking trail that should be maintained and enhanced. (objective 4)

Waskasoo is a diverse community that values and shares the natural, artistic and historical neighbourhood. The goal was and is enhancement and maintenance of all properties. A big 3 storey building that densifies an already dense neighbourhood is a discouragement. A total opposite of objective 5.

Thank you for your time and interest in my sincere concerns of this development application.

Regards,

A solid black rectangular box used to redact the signature of the sender.

January 22, 2026

City of Red Deer
Subdivision & Development Appeal Board
Box 5008
Red Deer, AB, T4N 3T4
Appeals@redeer.ca

Dear Members of the Subdivision & Development Appeal Board,

*Re: Proposed Zoning Changes and Development Permit Application East Lincoln Properties –
4240 59 Street*

While I was not directly notified of the application for a Development Permit by East Lincoln Properties for the lot at 4240 59 St, nor the notice of appeal, as a long time resident of Red Deer with an interest in as they relate to the historical neighbourhood, the environmental health of the Sanctuary, and to the wider environment of our city, and user of our beautiful trails, I am writing to formally express my concerns regarding the proposed development. I believe it will permanently and negatively impact the neighbourhood and contradict several key principles that guide responsible planning in the Waskasoo Character Statement.

It must be noted that this is the third attempt by this developer to over-develop on this particular lot. The pressure on this neighbourhood continues. What message about the vision for this neighbourhood is being missed? Certainly, all pertinent development standards and regulations for this neighbourhood had been provided and from my understanding explained. They have clearly been ignored or dismissed by this developer and frankly from the recommendation by staff as well. The Waskasoo Community Association has made a compelling argument that I totally support.

First, the proposal does not align with the established Neighbourhood Character Statement that has long shaped the identity, scale, and architectural continuity of this historic area. The proposed form, massing, and intensity appear incompatible with the surrounding environment and risk undermining the cohesive aesthetic and cultural heritage that residents and the municipality have worked hard to preserve.

Red Deer is well known for its wonderful trail, parks and green spaces receiving many awards and recognition for its development.

The proposed revision to Parks and PS zones to allow large developments in our parks and schoolyards as well as the removal of most environmental and trail related recommendations in the new Intermunicipal Development Plan are just a few of the disturbing decisions that seriously threaten the trails and green spaces that are cherished parts of our city that attract both visitors and new residents.

Looking at the Site/Context Plan, it is clear that the existing South Bank Trail will be impacted by this proposal. This particular intersection links key sections of the trails and is key connector that is extremely well-used by pedestrians, cyclists, scooter-riders, and skateboarders.

Neighbourhood residents out walking their dogs, commuters headed into and out of downtown for work, and children heading to and from school all make use of this section of trail.

Second, the site is situated directly adjacent to a recognized wildlife corridor and lies within close proximity to the river environment, both of which are consistently recognized as a true asset essential ecological asset within our community.

Ecological corridors report – Parks Canada 2024 states that ecological corridors provide biodiversity and human well-being benefits. They are “nature-based solutions” that:

- help species adapt to climate change by protecting and restoring ecosystems
- lessen the impact of human development on natural habitats
- connect various habitat types that species need to eat, breed, and migrate
- support vital ecosystem services like the provision of food and clean air, and nutrient and water cycles
- maintain healthy and viable wildlife populations
- promote human-wildlife coexistence
- foster connections between people and nature

This corridor supports the movement, habitat, and overall health of local wildlife populations. The protection of this wildlife corridor is critical for the long term utilization of the Sanctuary by ungulates and other animals. Without a means of entering and exiting the Sanctuary freely, wildlife populations may abandon the area in order to find more accessible

Increased development pressure—particularly in the form proposed—may disrupt these environmental functions, introduce additional stressors, and diminish the ecological integrity of the river valley.

The Red Deer River has also been increasingly threatened by development and subsequent erosion. There are numerous places along the river, through the City, where the bank has required armouring.

Protecting our historical neighbourhoods and natural systems is vital for maintaining a sustainable, livable community. For these reasons, I respectfully request that the Planning Department undertake a thorough review of the proposal with particular attention to:

1. Compliance with the Neighbourhood Character Statement and other applicable statutory planning documents.
2. Impact on heritage value, including architectural consistency and neighbourhood identity.
3. Environmental considerations, specifically the implications for the wildlife corridor, riparian zone, and long-term ecological health.

4. Opportunity for community consultation, ensuring residents have meaningful input in decisions that affect the future of their neighbourhood.

I trust that these concerns and submissions provided by Waskasoo Community Association and interested and impacted residents like me will be given serious consideration before any approvals are granted. As a resident in the historical neighbourhood of Parkvale with the Waskasoo Creek running beautifully through Barrett Park, I am seriously concerned that should this development be approved, other future projects adjacent to Red Deer's natural areas would have precedence to lean on; other undeveloped areas would potentially face similar development threats.

Thank you for your attention to this matter.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Cc: WCA Secretary – secretary@waskasoo.info

Re: Appeal of Development Permit – 4240 59 Street

Request: Uphold the Municipal Planning Commission decision and dismiss the appeal

Submitted to: Subdivision and Development Appeal Board (SDAB)

Via: City of Red Deer Administration (as directed)

Position

I am a resident of the Waskasoo neighbourhood and hold a Master of Planning (MPlan) from the University of Calgary (2018), and I offer this submission in my capacity as an affected resident.

This submission supports the Municipal Planning Commission's unanimous decision to deny the development permit for 4240 59 Street and respectfully requests that the Subdivision and Development Appeal Board (SDAB) dismiss the appeal.

The MPC decision reflects a correct and careful application of the Waskasoo Area Redevelopment Plan (ARP), a statutory plan, including its Environmental Character Area policies, and the discretionary-use test set out in the Land Use Bylaw.

Statutory Framework

The Waskasoo Area Redevelopment Plan (Bylaw 3567/2016) is a statutory plan adopted under the Municipal Government Act. The Environmental Character Area policies and Character Statements form part of the ARP and therefore carry statutory force. Decisions of a development authority or appeal board must conform to statutory plans and applicable bylaws.

Environmental Character Area Context

The subject lands are located within an Environmental Character Area, which is intended to protect sensitive environmental systems, wildlife corridors, mature vegetation, trails, and long-standing river valley views, and to require low-impact, context-sensitive development that respects both the natural and built character of the area.

Clarification of Impact Assessment under the ARP

The Environmental Character Area policies assess impact based on function and effect — including views, streetscape character, trail safety, and wildlife movement — not solely on whether properties directly abut or on generalized distance measurements.

Non-Conformance with the ARP

The proposed three-storey, 48-unit supportive living development does not conform to mandatory ARP requirements, including but not limited to the following:

- Excessive height, form, and massing that are inconsistent with the low-impact development expectations of an Environmental Character Area;
- Siting close to 59 Street that erodes established streetscape character and negatively affects mature tree cover;
- Removal of mature trees without meeting preservation and replacement objectives outlined in the ARP;
- Access design that conflicts with trail safety and the protection of wildlife corridors;
- Privacy, overlook, traffic, and neighbourhood amenity impacts affecting nearby homes, public spaces, and the broader Waskasoo environment.

These impacts are precisely the types of effects the Environmental Character Area policies are intended to prevent.

Discretionary Use Test

As a discretionary use, the development may only be approved if it conforms to statutory plans or, alternatively, if it does not unduly interfere with neighbourhood amenities or materially affect the use, enjoyment, or value of neighbouring land.

MPC reasonably concluded that the proposed development does not meet either threshold, and that conclusion is well-supported by the ARP.

Conclusion

The appeal seeks to overturn a decision that is firmly grounded in statutory policy. As the proposed development does not conform to the Waskasoo Area Redevelopment Plan and would unduly interfere with protected environmental and neighbourhood amenities, the appeal should be dismissed, and the Municipal Planning Commission's unanimous decision upheld.

Respectfully submitted,

[REDACTED]

Waskasoo Neighbourhood Resident

Secretary, Waskasoo Community Association

[REDACTED]

To: appeals@reddeer.ca

Att: Lisa Nord, Legislative Meeting Assistant

Cc: secretary@waskasoo.info

Re: #SDAB 0262 006 2025

Appeal of Municipal Planning Commission's Decision on DP088064

To Whom It May Concern:

As a concerned citizen who highly values Red Deer's Waskasoo Park and trail system, as long-time member of the Red Deer River Naturalists (whose offices are in Waskasoo), and as an author and biologist who has worked for many years communicating conservation and natural history, I was disappointed to learn that East Lincoln Properties is appealing the Municipal Planning Commission's refusal of their development permit application for 4240 59 St.

It is clear that this proposal threatens a key biodiversity linkage along a narrow and important riparian corridor and will result in serious degradation to the ecological integrity of Waskasoo Park.

Furthermore, the overall environmental value of this area, including the Kerry Wood Nature Centre and the Gaetz Lakes Sanctuary, will be permanently compromised. Development in this area as proposed will also deny the citizens of Red Deer an important open space and sets a precedent for additional development in this vulnerable corridor.

I strongly urge the Subdivision and Development Appeal Board to reject this short-sighted and irreversibly damaging proposal.

Yours truly,

[REDACTED]

[REDACTED]



Jan 20, 2026

To: Legislative Services, appeals@reddeer.ca

Cc: secretary@waskasoo.info

RE: Appeal #SDAB 0262 006 2025

Dear Members of the Subdivision and Development Appeal Board

Please be advised that the Red Deer River Naturalists (RDRN) strongly objects to the proposed supportive living accommodation at 4240 59th Street, Red Deer.

Not only does the application not meet the requirements of the Environmental Character Statements in the Waskasoo Area Redevelopment Plan, but it will also impact amenities shared by the entire city.

RDRN believes the location and size of the development will threaten the hydrological and environmental integrity of the Red Deer River, the adjacent riparian corridor, as well as the Gaetz Lakes Sanctuary, and the larger parks system. It also adds a hazard to the Waskasoo Park South Bank trail system and will significantly increase traffic on the rural road past 59th Street which is an already critically endangered path for wildlife moving through the city along the river and between Gaetz Lakes and the Red Deer River. We fully agree with the assessments submitted by the Waskasoo Environmental Education Society and Gaetz Lakes Sanctuary Committee.

RDRN was instrumental in establishing Waskasoo Park and its trail system and has long championed for the protection of this and other at-risk spaces within the City of Red Deer. Our office is also located within the Environmental Character Area at the Kerry Wood Nature Centre.

We urge you to uphold MPC's decision and refuse this development proposal.

Sincerely,

RDRN President

January 14, 2026

RE: Proposed Supportive Living Accommodation at 4920 59 St.

I wish to strongly object to the above proposal appeal as a long-time resident in the Waskasoo neighbourhood and person who would be directly affected by this proposal for the following reasons;

The application does not conform to the zoning bylaw. The lot is in the Waskasoo Area Redevelopment Plan's (ARP) Environmental Character Area and is subject to that Area's character statements. The character statements form part of the City of Red Deer Zoning Bylaw. The application does not meet the requirements of the Environmental Character Statement in the following ways:

- The building is excessive in form, height, and massing, will obstruct views and vistas from the road, will negatively impact the mature street character, is sited too close to 59th St., and will create overlook from windows and balconies.
- The landscaping will remove four mature specimen trees and is short 28 required trees and shrubs.
- Access should not cross the South Bank Trail or impinge on the natural boundaries and rural character of the road past 59 St.

The application will interfere with neighbourhood amenities by

- Exacerbating existing traffic issues on 45th Ave which, according to its design standard as an 11m wide undivided roadway, is already 250-350% overcapacity.
- Exacerbating existing parking concerns because there is no parking on 45th Ave past 59 St, no sidewalk on the south side of 59 St, and school bus parking for Gateway School on the north side of 59 St.
- Adding a hazard to the trail system with the access road.
- Obstructing longstanding views and vistas.
- Impinging on critically narrowed wildlife corridors and negatively impacting water quality with runoff from concrete and asphalt surfaces.

It will affect the use, enjoyment, and value of neighbouring land by

- Allowing overlook from dozens of windows and balconies onto multiple homes both across 59th St and down 45th and 44th Avenues.
- Obstructing longstanding views and vistas of the river escarpments.
- Siting the building so that the rear of the structure faces onto homes on 59th St. closing the development off from the community.
- Due to its massive size and industrial nature of this proposal, it will drastically reduce the value of my property

Respectfully,

[REDACTED]



ÉCOLE CAMILLE
J. LEROUGE SCHOOL

November 6, 2025

January 29, 2026

RE: Opposition to Development Permit Application – 4240 59 Street (Waskasoo Area)

To Whom It May Concern,

I am writing on behalf of the École Camille J. Lerouge School community regarding the current development permit application for 4240 59 Street, located between Gateway Christian School and the Red Deer River. As the principal of École Camille J. Lerouge since 2019, I represent a school of approximately 650 students in Kindergarten through Grade 9, located at 5530 42A Avenue. Our students come from across Red Deer and surrounding communities, including Blackfalds and Innisfail.

Our school community remains strongly opposed to this proposed redevelopment. We share the concerns of the Waskasoo Community Association regarding the significant impact this project would have on traffic congestion, parking, and pedestrian safety in an already overburdened area.

The proposed development site lies within a three-block radius of three major schools—École Camille J. Lerouge, Gateway Christian School, and Lindsay Thurber Comprehensive High School—which together serve more than 2,600 students daily. Traffic congestion during morning drop-off and afternoon pick-up times is already severe, with vehicles often backed up through multiple intersections. According to City standards, 45 Avenue is already operating at approximately 250–260% of its intended capacity. Adding even a single multi-unit residential building—let alone two—would exacerbate this situation considerably.

Of particular concern is the lack of adequate pedestrian infrastructure and safe student crossings. There is no sidewalk on the south side of 59 Street, and school buses

for Gateway Christian School occupy the north side during peak hours. This leaves little to no safe passage for students walking or biking to school. Increased vehicle volume from additional residential density would compound these risks for all students in the area.

Our school has worked closely with the RCMP and the City of Red Deer Bylaw Services over the past several years to mitigate speeding, illegal parking, and unsafe driving behaviors in the area surrounding our campus. Despite these efforts, conditions remain challenging and unsafe. Approving this development would undermine the progress made toward improving safety for our students and families.

We respectfully urge the Municipal Planning Commission to consider the significant and measurable safety and traffic concerns associated with this proposal. The cumulative impact on the Waskasoo school corridor cannot be overstated. Our community's priority must remain the protection and safety of children, staff, and families who use these streets daily.

For these reasons, École Camille J. Lerouge School does not support the proposed development at 4240 59 Street.

Thank you for your attention to this matter and for allowing our school community to provide input on an issue that so directly affects the safety and well-being of Red Deer's children.



From: [REDACTED]
To: [Appeals](#)
Subject: [External] Fwd: Development for 4240 59 St.
Date: January 29, 2026 8:32:55 AM

You don't often get email from [REDACTED]. [Learn why this is important](#)

Sent from my iPhone

Begin forwarded message:

From: [REDACTED]
Date: November 12, 2025 at 6:44:05 PM MST
To: development@reddeer.ca, secretary@waskasoo.info
Subject: Development for 4240 59 St.

To whom it may concern,

I am worried about the proposal of a seniors supportive living building on the above mentioned lot. Not only is this a high traffic area, it also proposes safety threats as the infrastructure cannot support more traffic. Ambulances often frequent such living facilities and could cause havoc on already busy roads with children ever present at crosswalks and sidewalks. Similarly, staff and visitors of such a facility would add to road volume and take away valuable parking for residents and be one more obstacle for students to navigate on their way to school. I also would love that land to be left for the enjoyment of the children of Gateway Christian School and the residents of the neighborhood. Gateway School hosts many events where children often frequent the field and use the surrounding sidewalks for exercise, community, and sport. I love that the view our children see is that of the river valley and connects them to nature and their roots with some being proud members of treaty 6 and 7.

Sincerely,
[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.info; rdrn.nature@gmail.com
Subject: [External] EAST LINCOLN PROPERTIES SUBDIVISION APPEAL - Ref. Appeal # SDAP 0262 006 2025
Date: February 02, 2026 12:27:41 PM

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Sirs/madams,

I am writing you today to express my family's strongest objections to the proposed East Lincoln Properties Subdivision and apartment proposal. We are shocked that it is even being considered anywhere near the Gaetz Lake Sanctuary or the Kerry Wood Nature Centre and McKenzie Ponds.

This proposal is completely unacceptable in such an ecologically sensitive area. Red Deer City Councils over the years have done an incredible job of making our beautiful city into one of the most admired parklands cities in Alberta, complete with a world class Nature Centre and Sanctuary.

It is inconceivable that a development like this would ever even be considered. As members of the RDRN and the Kerry Wood Nature Center we have always be so proud of the jewel that we have in these places. Our family and visitors are amazed that Red Deer has had the foresight to protect and enhance these areas and it would be an absolute shame to proceed with this damaging project.

I would refer you to the extensive and well written Gaetz Lake Sanctuary Committee's Ecological Impact Assessment of December 12, 2025. This development would have a profoundly negative impact on the Gaetz Lake Sanctuary and the Waskasoo neighbourhood.

My family and I, urgently request that you deny this proposal!

Sincerely,
[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.info; rdm.nature@gmail.com
Subject: [External] Appeal #SDAB 0262 006 2025
Date: February 01, 2026 6:08:15 PM

You don't often get email from [REDACTED]. [Learn why this is important](#)

I am writing to oppose this application.

As a citizen of Red for a quarter century, I have applauded all City Mothers and Fathers for identifying, harbouring and enhancing Nature in our midst!

What treasures we enjoy!

In this moment I want to focus on The Historic Gaetz Lake Sanctuary which has a vital ecological landscape linkage for wildlife movement, undisturbed soil structures leading to our river, thriving plant communities etc.... and unending opportunities for sharing the joys of four seasons in the heart of Red Deer.

Folks far more knowledgeable than I point to the importance of keeping this boundary area as it is. Perhaps enhancing over time?

Please consider their expertise and my humble view and keep this available for urban healthy development and resilience.

Thank you.

[REDACTED]
Environmentalist, Superager

I

From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskassoo.com
Subject: [External] Apartment development @ Waskasoo park
Date: January 29, 2026 6:44:03 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

Reference # SDAB 0262 006 2025

I oppose this development in a park area along the Red Deer river. This is an especially narrow area of a continuous long corridor along the Red Deer River and the development would definitely affect wildlife and restrict the movement that exists at this time.

A development affects both large mammals and small creatures like weasels, salamanders and other species crossing on 45th from grassy and forest areas to the river.

The bank is eroding and changed water flow due to new hard surfaces, more usage and less vegetation may increase erosion.

This is generally a dark area and conducive to wildlife and birds. The development will increase light and noise in a relatively quiet area.

The road (45th) is narrow, sometimes cars parked on both sides and from traveling to events at Kerry Wood, it is difficult to imagine extra vehicles going in both directions particularly at night when deer are also crossing.

At the previous hearing, the development spokesman said that there would be minimum cars. This is not true as many seniors do have cars.

If there was ever a reason to evacuate this area, it would be impossible to do so quickly particularly if there were events as well as traffic from the apartment.

The trails along the river, Gaetz Sanctuary, MacKenzie trails and programs at Kerry Wood Nature Center are all used extensively and along with the schools it would be detrimental to add more to this area. People love this area and come from all areas of the city to use it. Thank you for considering preserving this as once more is added it can not be reverted.

[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.info
Subject: [External] Appeal number #SDAB 0262 006 2025
Date: January 30, 2026 12:26:48 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

Attention :Members of the Subdivision and Appeal Board.

Re: Appeal East Lincoln Property application to build a 3-storey, 48-unit seniors apartment building along 59th.street between Gateway School and the river.

I submit the following concerns regarding this application:

1. I have lived on Moore Crescent for almost 56 years. I often use the trails behind my house and along the river.

The access to the parking lot crosses the South Bank trail and is creating a hazard for trail users.

2. The application should include 28 more trees and shrubs to meet the minimum landscaping requirements.
3. The location of the building across the south end of the lot next to the 45th Ave. lookout:
 - impinges on the already severely compromised wildlife corridor along the Red Deer River and Waskasoo watershed.
 - will increase run off from concrete and asphalt into the Red Deer River and Waskasoo watershed.
4. The development will add traffic and congestion to the already compromised 45th Avenue and the rural road access to Mc.Kenzie Lakes.
5. The development does not meet the requirements laid out in the Environmental Character Statement in the Zoning Bylaw.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Subject: [External] #SDAB 0282 006 2025 East Lincoln Properties Subdivision Appeal
Date: February 01, 2026 10:31:53 AM

You don't often get email from [REDACTED]. [Learn why this is important](#)

Cc rdm.nature@gmail.com
Secretary@waskasoo.info

As a long time resident of Red Deer and area I am very concerned about the preservation of some of the natural areas we have in and around our city.

I can remember as a teacher at LTCHS, a member of the Park's Board and other boards regarding Gaetz Lake Sanctuary and the Kerry Woods Center, how hard we worked to preserve this entire area in its natural state.

It is vital for the long term survival of this area that a buffer area be maintained.

If we were to allow the proposed development to occur I believe this would be the death sentence for this area for future generations .

Preservation can only happen prior to development ,never after .

Our trail system ,natural areas,easy access to these areas and much more is what makes Red Deer a place people are attracted to for work and enjoyment .

The subdivision proposed must be defeated or future generations will be the big losers

Thank you for your consideration in this vital matter .

[REDACTED]

Appeals@reddeer.ca

Subdivision and Appeals Board

City of Red Deer

4914-48 Avenue

Red Deer, AB. T4N 3T4

Re: Appeal number #SDAB 0262 006 2025

Thank you for the opportunity to respond to East Lincoln Property's (ELP) appeal of the Municipal Planning Commission's decision to refuse their application to construct a three-story apartment building at 4240-59 Street. We live on 45th Avenue, one-house-removed from 59 Street, and will be directly impacted by every aspect of this proposed development.

At the outset, let me say that I completely support the comprehensive documents developed and submitted by the Waskasoo Community Association (WCA), the Waskasoo Environmental Education Society (WEES) and the Gaetz Lakes Sanctuary Committee (GLSC). We purchased our home in Waskasoo in 2008 and are long-time WCA members and supporters. We are deeply invested in our retirement home, the Waskasoo community, and in the future of Red Deer.

When ELP first proposed rezoning these lands (2022) to build two apartment buildings on this site I used my opportunity to speak to Council to characterize the impact of the proposal on the larger environment. Red Deer is known as a 'city within a park' by virtue of its vision in developing the Waskasoo Park system. Like most cities, Red Deer grew and developed along the waterways but is unique in retaining functional connectivity between protected areas. I used satellite imagery and GIS measurement to show that there is a continuous riparian corridor connection from well SE of Red Deer, along Piper Creek, into lower Waskasoo Creek, and then along the right bank of the Red Deer River northward through Gaetz Lakes, McKenzie Trails and Riverbend Park, and then on to the Blindman River confluence near Burbank. This connection of park and preservation almost always exceeds the 100 m standard of a riparian buffer, and in many places is 200-300 m or more wide. As a Professional Biologist for some three plus decades, I assured Council that this is an extraordinary achievement. Biodiversity can flow almost unimpeded from the hinterlands to the SE, through the urban centre and northward to the next watershed (Fig 1).

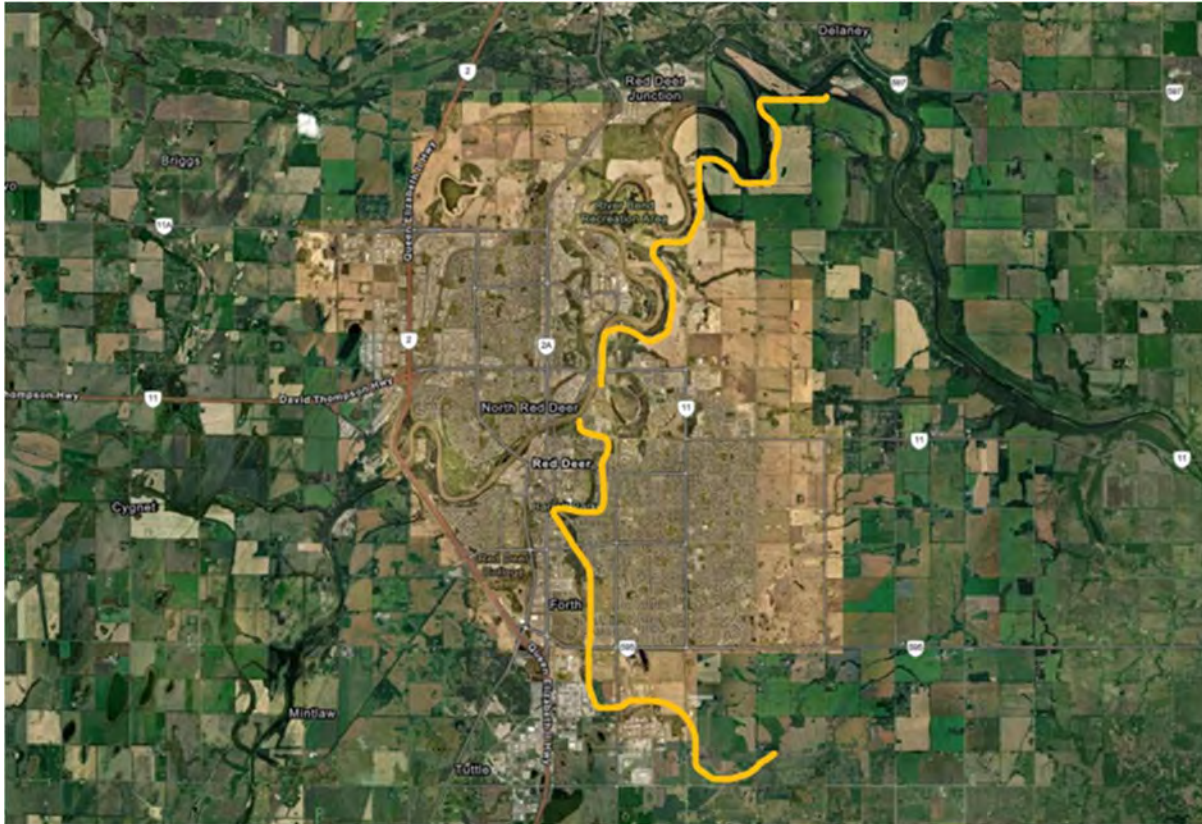


Fig 1: Sketch (yellow line) highlighting the riparian corridor connecting Piper Creek from the SE, northward through south Red Deer. Piper Creek joins Waskasoo Creek near Rotary Park and the combined flow joins the Red Deer River in Gaetz Park, just upstream of the proposed development (the visible gap).

The only significant gap in this amazing connectivity is the 250 m along the lands of this proposed development (Fig 2). Here a narrow, slumping strip of failing riverbank borders a busy roadway and the paved park trail. In many places along this stretch, the road edge is within 4 m of the scarp; below are a jumbled and dangerous series of slump terraces, that form a steep slope to the water's edge (Fig 3-9). Opposite, the road is only buffered by a 15 m Municipal Reserve (MR). The paved park trail occupies the centre of the MR and this open and exposed corridor abuts the frost-fenced Open Space of the adjacent playing field. Still, every Waskasoo resident knows the darkened road corridor and playing fields comprise a nightly foraging ground and access corridor for the hares, deer, moose and meso-carnivores that frequent our lawns, lanes and boulevards. It is the 'charismatic megafauna' that remind us of what we can't see so easily – every student of biology knows that biodiversity utterly depends on the lower trophic levels – the microbes, invertebrates, fungi, plants, herptiles, small mammals, and songbirds that sustain functional ecosystems and life. They do not move so easily along roadways, paved paths, xeriscapes and slump debris; nor can they simply cross the rivers and streams – they are bound by the continuous connection of the right bank.



Fig 2: This property lies adjacent to about **250 m of the riparian corridor**. The width from waterline to the road varies from **12 to 15 m**. In many places there is a little as **4 m** between the road and the bank crest. The road is **7.5 m** wide and the **3 m** wide paved park trail lies within the road allowance. A **15 m** municipal reserve separates the property from the road allowance. Note that a **100 m** riparian buffer would extend to the base of the play hill near the east side of the property.

ELP's consultants provided reports to assure us that the Open Space of the playing fields provides only "low quality" habitat and had not been reported to harbor endangered species. They reported online databases and apparently never walked, tracked or assessed the slumping riparian zone, and utterly failed to consider the role this entire Open Space plays in linking the Waskasoo Park system.

Red Deer's park system stands at a functional precipice. We need to protect and enhance this narrow riparian border and the open space adjacent to preserve the connection from SE to central Red Deer, and then NE to the Blindman watershed. I note that both upper Waskasoo Creek and the Red Deer River west (left and right banks) are badly fragmented. The proposed expansion of the QE II highway into the heart of Maskepetoon Park is illustrative of the growing ecological disconnect in that direction.

The City of Red Deer hired geotechnical consultants to evaluate (Parkland Geo, 2018) and monitor (Stantec, 2025) slope stability at several sites along the Red Deer River. This stretch of the right bank was studied, and we recently had opportunity to examine the reports. The reports describe historic block slides both north and south of the Kerry Wood Nature Centre entrance. One of these slides extended back into the crest about 8 m. There is toe scour along the south edge of this stretch (the riverbend adjacent to 59 Street) and that area slumped during the 2005 flood (Fig 3). The bank was repaired and a nearby portion has been armored (Fig 4: gabions). I note that the stepped access was repeatedly damaged by high water events (Fig 5) and has recently been removed, with additional reclamation work done (2025).



PHOTOGRAPH 35 (2005): EAST RIVER BANK AND WASHED OUT ACCESS TO RIVER AT THE SOUTH END OF THE STUDY AREA, FACING SOUTHEAST (AFTER FLOOD)

Fig 3: Image of washout at 59th St and 45th Ave after the 2005 flood. Screenshot from Parkland GEO, Bank Stability Report, 2019.



Fig 4: Gabion structure built to stabilize the bank downstream of the old landing site. The red arrow marks the railing above the former landing site.



Fig 5: High water photo (2013) on the outside bend where the South Bank Trail meets 45th Av. Note that both landings are entirely submerged.



Fig 6: Slump debris immediately downstream of eroding gabion structure.



Fig 7: Mature trees sliding down from the eroding and unstable bank crest.



Fig 8: Dead trees perched over slumping soil along 45th Avenue (near 59 St),



Fig 9: Slump terraces looking downstream along the riparian zone of 45th Avenue.

Parkland Geo's report describes the existing slope crests and slope face as "stable in the short term and marginally stable in the long term". They note that groundwater levels are linked to the river surface elevations along this reach. The riverbank in this area is 4-5 m above the normal river levels and the 1:100-year flood levels are about 2.5 m higher than normal levels. However, with climate warming we know that we will experience the effects of atmospheric rivers and extreme rainfall events – think Canmore, Calgary, High River and the Coquihalla. The magnitude and frequency of flood events are changing dramatically. Some authorities now predict that 1:100-year rainfall events may now occur as frequently as once or twice per decade, and larger magnitude events are certain to occur.

Parkland Geo notes that "high water levels related to flooding" will have a destabilizing effect, and describe a typical river bank failure along 45th Avenue as "localized rotational landslides in the fine alluvial spoils due to wetting of the slope". We can expect storm drainages to be overwhelmed in extreme rainfall events, and yet we are contemplating replacing vegetated Open Space with the impervious surfaces of buildings and asphalt. In flood events elsewhere we see storm drainages fail under extreme rainfalls; there is no question that resultant ponding and soil saturation will exacerbate the existing riparian instability.

I note that the Stantec Monitoring Report (2025) identified ‘gopher holes’ in the lower bank. This seems most unlikely, but in my own observation the riparian slopes along 45th Avenue are riddled with the burrows of aquatic mammals. Muskrats in particular build lengthy burrow systems (up to 14 m) and the ‘gopher holes’ observed were almost certainly vertical airshafts associated with the burrows. They are also great conduits for flood waters and will likely contribute to additional slope instability.

Parkland Geo (2019) predicted localized slides “would be no larger than 10-15 m wide with a back scarp of 3-8 m back from the crest”. I observe that for many areas on this stretch of 45th Avenue, the road is only 4 m from the crest. This kind of failure then would certainly mean a perched roadbed, with a necessity for road closures and re-routing (Fig 10 sketch). More significantly, the tenuous riparian connection would be lost and there would be pressure from developers to have the city armour the entire stretch – environmentally, the worst possible outcome. Armouring is immensely expensive and irreparably destroys both aquatic and riparian habitat.

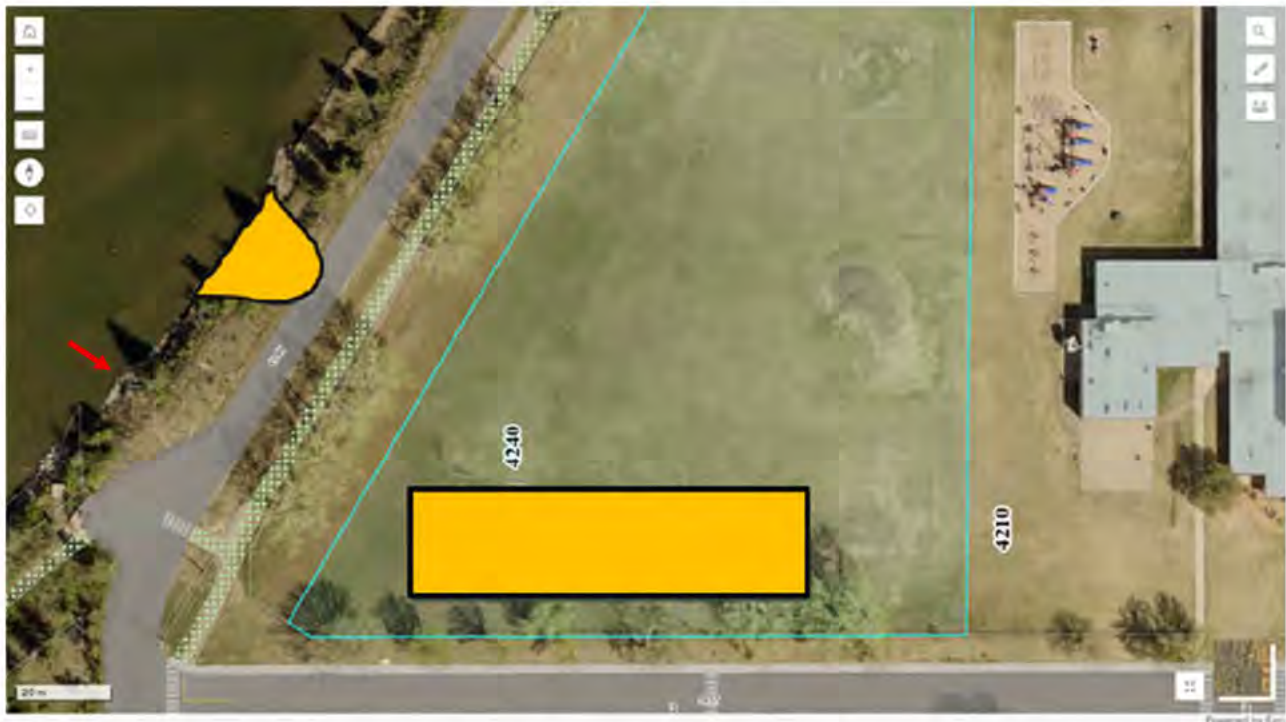


Fig 10: Sketch of the property with a ‘simulated slump’ added. This sketch orients a **15 m** slump centered on the bank crest to show the probable impact on the road. Note that a slump of this size eliminates the already tenuous riparian zone and undermines a portion of the road. Nearby developments would leave little space to shift the roadbed and Park Trail to preserve public access. The red arrow marks the location of the gabions associated with the 2005 flood.

ELP bought this property knowing fully well that there would be restrictions to development, that the Area Redevelopment Plan (ARP) was in place to preserve the character of the neighborhood, and that the property was part of the Open Space Major portion of the Environmental Character Area. Together, these criteria are critical to the future access, use and ecological functionality of the area. Every user of the Waskasoo Park trail system, Kerry Wood Nature Centre, Gaetz Lakes Sanctuary, and McKenzie Trails Park is now confronted by the spectre of a park system irrevocably divided by this high-density development. This is an issue for Waskasoo and all Red Deer.

On a more personal note, those of us living on 59th Street, and 45th, 44th and 43rd Avenues will see our view of the Open Space replaced by the backside of a three-story apartment complex. It is utterly naïve to expect that if this appeal is successful there will not be a second or even third phase of building to follow. I was involved in the development of the viewsheds included in the WCA submission – they are a dramatic demonstration of the immediate visual impact for those of us living in the area. Beyond destroying the viewshed north and the utter loss of Open Space, it is disturbing to imagine bored apartment dwellers casually ‘sharing’ the view of our back yards, decks and windows. It takes little imagination to see the impact on both quality of life and future property values.

This proposed development, is a massive block structure 81.5 m long and 3-storeys high. The location and orientation are clearly chosen to facilitate additional development (buildings) without regard to wildlife movements, human safety, open spaces or neighborhood impact. Quite simply it could not be sited to cause more harm to the function of the wildlife corridor and the Park trail system. The siting blocks the nocturnal wildlife corridor, adds a new pedestrian path (sidewalk) to the congestion near where the South Bank Trail crosses 45th Avenue, and adds a new and unnecessary road crossing of both the park trail and wildlife corridor.

Submissions from the WCA, local schools and concerned residents make it clear that we already have serious traffic issues in east Waskasoo. In the time I’ve lived on this block I’ve seen three serious accidents – these are cars striking parked cars as they thread the oncoming traffic on a street too narrow to support the twice-daily school pick-up rushes. Mirror strikes are a common occurrence here. Bear in mind also that 45th Avenue is the only access for heavy equipment and trucks servicing the Parks Nursery, storage compounds, and park amenities to the north. Adding still more traffic from high-density development residents, far from transit and basic services like grocery stores, makes absolutely no sense. What it does is ensure more automobile crossings along the busy South Bank trail, more risk to park trail users and school children, more light pollution to hinder and

endanger nocturnal wildlife movement, and critically reduced ecological connection to the parks north, south and west.

I urge SDAB members to consider the larger context of the impact on our park system. As well documented by WCA, the Waskasso Environmental Education Society, The Gaetz Lakes Sanctuary Committee, and numerous concerned citizens, we are legally and morally bound to respect the ARP and the statutory protections in place for our residents, community and the larger environment. Some development may be possible on these Public Service lands - think gently treed playing fields, low density single care structures, or dispersed recreation, all set eastward well back from the river – but never high-density, for-profit ‘care’, apartment complexes, thinly disguised behind a hair dressing parlor as ‘seniors care’.

Thank you for your consideration.

[REDACTED]

[REDACTED], Wildlife Biologist

[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Subject: [External] Building between Gateway School and the Red Deer River
Date: January 29, 2026 9:06:11 AM

I live on the corner of [REDACTED]. It's bad enough to have to School traffic twice a day. You have to be out before 8:15 a.m. and then at 3:25 p.m. the traffic from the parents picking up their kids and the busses.

A 3 story building is ridiculous as there is one road in and one road out. The parking is going well to be herendous.

This is on an animal corridor that is already passed. The road 45 Avenue is not sufficient to handle the increased traffic of said apartment.

This is ridiculous and having lived in my house since 1985 the traffic is terrible.

So I am not in favor of this ridiculous building.

Yours truly,

[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Subject: [External] Development near Gateway school
Date: January 29, 2026 12:37:44 PM

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

To whom it may concern

My husband and I have recently purchased a home at [REDACTED] We are both senior citizens and chose this area for its proximity to the Kerry wood nature centre and trails as well as the Red Deer river. We also are grateful for the minimal traffic (except at school dismissals) on any given day.

A proposal to add this development and change the whole demographics of this quiet and beautiful area is very upsetting and we believe a huge mistake on the part of the city planners.!!! Please do not go forward with this project.

Sincerely,

[REDACTED]

Sent from my iPad

From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.info
Subject: [External] Apartment on 59th
Date: January 29, 2026 9:48:10 AM

You don't often get email from [REDACTED] [Learn why this is important](#)

To whom it may concern,

Good morning. I am a resident living in the Waskasoo neighbour hood. I am writing in regard to the apartment buildings being built on 59th St. next to Gateway school. I have lived in the neighbourhood for almost 8 years. In that time, I have taken countless walks down the trails trips to the parks with my children. As my kids have gotten older, I have also allow them to walk or bike to the park of Gateway Christian school on their own. In these eight years, I have also witnessed bumper-to-bumper traffic around school times and limited street parking. Regardless of school times, we enclose two very popular trail systems and parks (Kerrywood Nature Centre and Mackenzie Trails) which makes this area high traffic on a daily basis as people come and go from enjoying the beautiful trails and sanctuary. Adding more vehicles to this would congestion the area even further.

I have concern for child safety with increased traffic coming and going as the neighbourhood has lots of children whom I see playing outside often.

Building such a large establishment so close to the sanctuary posses a risk to the wildlife as the noise, increased traffic, and increased humans may scare them away or cause them injury.

Please reconsider this development on the lot of 59th street in waskasoo.

From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.info; rdm.nature@gmail.com; city.council@reddeer.ca; [MayorMailbox](#)
Subject: [External] Appeal number #SDAB 0262 006 2025
Date: January 30, 2026 9:52:24 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

ATTN: Subdivision Appeal Board, City planning staff, and esteemed members of City Council,

I write to you once again to express my opposition to the proposed rezoning and development of large seniors apartment buildings at 4240 59 Street in Waskasoo.

Overall, I do not oppose zoning changes that improve smart urban planning (such as densification) which allows for an increase to available housing stock. However, I feel that this particular project is misplaced in terms of location and scope. My family regularly enjoys these park spaces in the area, and this development will hinder our ability to access these places for what they should be - natural areas.

This particular parcel of land is currently located in an area that helps sustain the connectivity of our City's "crown jewel" of Waskasoo Park. If this parcel of land was developed according to the proposal from East Lincoln Properties, it would limit the connectivity of our park system to a skinny sidewalk along the edge of the property, limiting the aesthetic experience of travelling through our park system.

Furthermore, development of this parcel of land will impact our natural spaces in several irreversible ways. First, the riverbank will likely require stabilization in order to minimize potential effects of high water, which will disturb the riverbed, and likely impact fish habitat. Second, this will make the existing 42 Avenue roadway busier, increasing the likelihood of vehicle-wildlife collisions.

In addition, these local roadways are not constructed in a way that facilitates having so many people suddenly added to the neighbourhood. For example, 42 Avenue does not have any shoulders, curbs or sidewalks, and essentially functions as a "country road". 59 Street also lacks sidewalks, and can already be quite congested with traffic flowing through the area during the start and end of the school day.

Finally, as a parent whose children attend Camille J Lerouge School, I am concerned that the high traffic volumes in the neighbourhood during peak school hours will become even more untenable and unsafe with this poorly located over-development.

To be clear - I support the construction of housing units that increase density in our City's core and elsewhere, and also meet a demand for certain housing types for various

demographics such as seniors. However, there are a number of other potential building sites around the City that seem as though they would serve this purpose just as well, if not better, including other riverside locations such as Capstone, or the Kinex Arena site now that it has been decommissioned and demolished. None of these locations would require us to subtract valuable land from our precious parks system. The City would be well-positioned to propose a "land swap" with Lincoln for their Waskasoo property in exchange for either of these building sites, with the increased likelihood of development approval an advantage for the current land owner and development proponent.

Thank you for your consideration of this vital matter, and I welcome the opportunity for dialogue should you wish to speak further.

Warmest regards,



Acknowledging the land I gratefully have the opportunity to dwell on is situated on the traditional territory of Treaty 6, Treaty 7, and Region 3 with the Metis Nation of Alberta.

Wellbeing Note: *Receiving this email outside of your typical working hours? We may work at different times - managing work and life responsibilities is unique for everyone. I have sent this email at a time that works for me. Please respond at a time that works for you.*

From: [REDACTED]
To: [Appeals](#)
Subject: [External] East Lincoln Development Proposal #SDAB 0262 006 2025
Date: February 02, 2026 11:56:23 AM

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Members of the Appeals Board:

Attention: Members of the Municipal Planning Commission

As an avid user of the trail system and an environmentalist concerned about our river, wildlife corridors and our natural areas I am opposed to the East Lincoln proposal that is up before the appeals board. Because of its location along the Red Deer River, adjacent to the Waskasoo Park system and South Bank Trail, as well as near major nodes in the Red Deer park system, including the Gaetz Lakes Sanctuary, Kerry Wood Nature Centre, and McKenzie Trails, the proposed development at 4240 59 St stands to impact amenities shared by the entire city.

I submit the following concerns regarding this application:

1. The development will add traffic and congestion to 45th Avenue and the rural road access to McKenzie Lakes
2. Access to the parking area needlessly crosses the South Bank trail creating a hazard for trail users
3. The application should include 28 more trees and shrubs to meet the minimum landscaping requirements
4. The development does not meet the requirements of the Waskasoo Environmental Character Area
5. The location of the building across the south end of the lot next to the 45th Ave lookout:
 - impinges on the already severely compromised wildlife corridor along the Red Deer River, and
 - will increase run off from concrete and asphalt surfaces into the Red Deer River and Waskasoo Creek

My main concerns are the environmental impacts of this development and the precedent it sets for overdevelopment on or near important watersheds and natural areas.

Sincerely

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Cc: secretary@waskasoo.info
Subject: [External] Waskasoo Building
Date: January 29, 2026 11:44:45 AM

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Municipal Planning Committee,

I hope this message finds you well. I am writing to express my strong opposition to the proposed development and construction of a seniors apartment building adjacent to Gateway Christian School. While I fully support initiatives that benefit our community, I believe this particular project poses significant concerns that warrant careful consideration.

First and foremost, the increase in traffic that the apartment building would generate is alarming. The influx of residents, visitors, and service vehicles will not only exacerbate congestion in the area but also create dangerous conditions for our children. The proximity of the building to the school means that many students will be navigating these busy streets daily, increasing the risk of accidents and compromising their safety.

Additionally, parking constraints are likely to arise, as the demand for parking will surge with new residents and their guests. This could lead to vehicles spilling over into surrounding neighborhoods, further complicating the already limited parking situation for parents and staff at the school. The potential for blocked driveways and narrow streets creates an environment that is not conducive to the safety and well-being of our children.

Furthermore, the construction and subsequent presence of the apartment building will likely lead to noise pollution that could disrupt the learning environment at Gateway Christian School. Our students require a focused and quiet atmosphere to thrive academically, and the sounds of construction and ongoing noise from the building could lead to class interruptions and hinder their ability to concentrate.

It is also important to note that the field adjacent to the proposed site is an essential space for our students. They utilize this area daily for recess, sports activities, and physical education. The development could reduce access to this vital resource, limiting the opportunities for physical activity and play that are crucial for their overall development.

In conclusion, while I understand the need for diverse housing options in our community, I urge the committee to reconsider the implications of this proposed development near Gateway Christian School. The safety, well-being, and educational experiences of our children must remain a top priority.

Thank you for considering my concerns. I hope the committee will take a thoughtful approach to this proposal and seek alternatives that do not compromise the safety and quality of life for our students and their families.

Sincerely,

[REDACTED]

(Parent of a Student at Gateway Christian School)

From: [REDACTED]
To: [Appeals](#)
Subject: [External] East Lincoln Property Appeal
Date: February 01, 2026 7:40:52 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

Attention: Subdivision and Appeal Board

SDAB 0262 006 2025

I am opposed to the proposed development of East Lincoln Property in Waskasoo.

I agree with the stance taken by the Waskasoo Community Association, Red Deer Public School Board, Waskasoo Environmental Education Society, Gaetz Lakes Sanctuary Committee, and Red Deer River Naturalists.

I am a resident of Waskasoo. I have many concerns.

Because of its location along the Red Deer River, adjacent to the Waskasoo Park system and South Bank Trail, as well as near major nodes in the Red Deer park system, including the Gaetz Lakes Sanctuary, Kerry Wood Nature Centre, and McKenzie Trails, the proposed development at 4240 59 St stands to impact amenities shared by Waskasoo and the entire city.

I submit the following concerns regarding the application:

1. Access to the parking area needlessly crosses the South Bank trail creating a hazard for trail users.

Access should not cross the South Bank Trail or impinge on the natural boundaries and rural character of the road past 59 St.

2. The application should include 28 more trees and shrubs to meet the minimum landscaping requirements.

The landscaping will remove four mature specimen trees.

3. The location of the building across the south end of the lot next to the 45th Ave lookout:

-- impinges on the already severely compromised wildlife corridor along the Red Deer River, and

-- will increase run off from concrete and asphalt surfaces into the Red Deer River and Waskasoo Creek watershed

As a homeowner in Waskasoo, the water portion of my house insurance is very high. This is proof that close proximity to the river is a real issue. It seems foolish to compromise the integrity of the river bank.

I agree with the letter submitted by the Waskasoo Environmental Education Society.

4. The development will add traffic and congestion to 45th Avenue and the rural road access to McKenzie Lakes. Traffic before and after school is a problem already. If there is more traffic, this may cause safety issues including inhibiting timely access by emergency vehicles.

- Exacerbating existing traffic issues on 45th Ave which, according to its design standard as an 11m wide undivided roadway, is already 250-350% overcapacity.
- Exacerbating existing parking concerns because there is no parking on 45th Ave past 59 St, no sidewalk on the south side of 59 St, and school bus parking for Gateway School on the north side of 59 St.

5. The development does not meet the requirements laid out in the Environmental Character Statements in the Zoning Bylaw

The application does not conform to the zoning bylaw. The lot is in the Waskasoo Area Redevelopment Plan's (ARP) Environmental Character Area and is subject to that Area's character statements. The character statements form part of the City of Red Deer Zoning Bylaw. The application does not meet the requirements of the Environmental Character Statement in the following ways:

- The building is excessive in form, height, and massing, will obstruct views and vistas from the road, will negatively impact the mature street character, is sited too close to 59th St., and will create overlook from windows and balconies.

It will affect the use, enjoyment, and value of neighbouring land by allowing overlook from dozens of windows and balconies onto multiple homes both across 59th St and down 45th and 44th Avenues, obstructing longstanding views and vistas of the river escarpments and siting the building so that the rear of the structure faces onto homes on 59th St. closing the development off from the community.

As a resident of Waskasoo, I will be affected by the increase of traffic. Building structures that are too tall and large, affects the privacy of current residents and does not consider the environmental character of the area. This will affect current and future developments. As a resident of Red Deer, this development will impact the very popular McKenzie Lake area. The risk of damaging the river bank will affect Waskasoo and access to these parks. And a general concern is the impact the development will have on the river and the environment.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [Appeals](#)
Subject: [External] secretary@waskasoo.info, rdm.nature@gmail.com
Date: February 02, 2026 2:03:31 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

Regarding Appeal number #SDAB 0262 006 2025

I am a citizen of Red Deer and would like to express my concerns regarding the East Lincoln three story apartment proposal next to Gateway School and the Red Deer River.

As a long standing cyclist, runner, member of the Kerry Wood Nature centre and user of its magnificent 100 year old Gaetz Lake Sanctuary trails, the impact of this development on our river system, wildlife and trail network would be profound.

The upheaval of the land would cause increased erosion and soil runoff into the Red Deer River, impacting fish and micro organisms that keep our already fragile environment in balance. Wildlife and waterfowl depend on the already low flowing Red Deer River - contaminating it would be detrimental to their well being

Gaetz Lake Sanctuary is home to hundreds of wildlife species from flora to fauna. Birds, Moose, Cougar, Deer, Beaver, Fox and the massive influx of waterfowl in the spring create a cacophony of sounds and sights that are a wonder to any person. I have also had the pleasure of watching the herding dogs and goats during the summer keeping control of grasses and yes, noxious weeds. The Kerry Wood Nature Centre has a high volume of traffic from school children, tourists and Red Deer citizens alike. Their environmental stewardship educates the many who pass through its doors, culminating the importance of preserving our precious ecosystem and this wildlife haven.

The East Lincoln apartment build is far more than a neighbourhood issue. This development would have a profound impact on the Gaetz Lake Sanctuary -- our jewel -- and on this narrow section along the very busy South Bank trail on the way to the Kerry Wood Nature Centre and McKenzie Ponds used by vehicles, cyclists, pedestrians, dog-walkers, runners, boarders, and students from three schools.

Please do not allow this Appeal to win!

Regards,

[REDACTED]

Red Deer, AB

From: [REDACTED]
To: [Appeals](#)
Subject: [External] SDBA hearing submission final list
Date: February 02, 2026 12:48:08 PM

Here is all 3 combined.

[REDACTED] my wife and I both want to speak.

My name is [REDACTED]. My wife and two children reside at [REDACTED]. The large-scale, monolithic development proposed by East Lincoln—advanced under the guise of “supportive living”—will cause permanent and irreparable harm to our neighbourhood and to our family’s quality of life.

In 2010, we undertook a substantial renovation of our home, investing more than \$250,000 over a two-year period. This investment involved extensive personal labour and financial risk and was made in reasonable and justified reliance on the City’s zoning, land-use framework, at that time. The renovation included a full second-storey addition, four large windows, and an open deck designed specifically as a sitting area oriented toward the adjacent green space and river corridor. These features were intentionally designed to take advantage of the scenic vistas and natural views that the Waskasoo ARP explicitly recognizes and seeks to protect.

The proposed development would fundamentally and permanently obstruct these protected views and scenic vistas, directly undermining the purpose and intent of the Waskasoo ARP and Environmental Character Statement. In doing so, it would effectively strip the value from a \$250,000 investment that was made in good faith and in compliance with all applicable planning policies and regulations. This is not a speculative loss; it is a direct consequence of allowing a development form and scale that is incompatible with the surrounding low-density, river-adjacent neighbourhood.

Beyond the significant planning and economic impacts, the destruction of this green space carries profound personal and cultural consequences for my family. As Métis citizens, our relationship to the land, river, and surrounding natural environment is deeply rooted and spiritual in nature. The loss of this green corridor is not merely a visual or recreational impact—it represents a serious disruption to our cultural connection to place and to the environment that is an integral part of our family life.

Had the developer made any meaningful effort to engage with the surrounding community, they would have understood that residents are not opposed to development in principle. Rather, the community’s position is clear and consistent: development must respect and preserve the established character of the neighbourhood, comply with the Land Use Bylaw and the Waskasoo Area Redevelopment Plan, and enhance—not erode—the public realm.

A clear and successful precedent exists nearby. Parkland Class developed a single-storey building that is compatible in scale and massing with its surroundings and incorporated a playground at the rear of the site, creating a significant community asset and a net benefit for the City of Red Deer. The new play school going up at KWNC is also a single story building that complies with the ARP. On a property of the size proposed by East Lincoln, a similar low-scale, sensitively sited approach—particularly with development oriented toward the rear

of the parcel—could substantially reduce adverse impacts on adjacent homes while remaining economically viable and profitable.

Importantly, the developer purchased this property with full knowledge of the neighbourhood character statement, the applicable Land Use Bylaw, and the policies and constraints imposed by the Waskasoo Area Redevelopment Plan. These documents are not aspirational; they are binding planning instruments that define what forms of development are appropriate in this location. It is unreasonable for a developer to acquire land subject to clear policy limitations and then seek to override those limitations through an incompatible proposal.

The community has consistently supported modest, well-designed forms of development that add value to the area, including small-scale residential, community-oriented uses, and culturally meaningful facilities such as an Indigenous or Aboriginal community centre that aligns with the area's environmental, social, and cultural context. Such uses would respect the intent of the ARP, reinforce neighbourhood character, and contribute positively to Red Deer as a whole.

This appeal is not about stopping development; it is about ensuring that development complies with the Land Use Bylaw, the Waskasoo ARP, and long-standing planning principles of compatibility, proportionality, and respect for established neighbourhoods.

The proposed East Lincoln development will result in measurable and permanent devaluation of my property by eliminating or severely degrading the natural amenities that currently sustain its market value — specifically, the unobstructed view of the river corridor, the riparian tree line that provides screening and privacy, and associated green space that is visible from my home and documented on Google Maps. Scientific literature demonstrates that environmental amenities are capitalized directly into residential property values. Systematic evidence from a recent review confirms that the presence, size, and accessibility of parks and green space significantly influence housing prices, and that changes in these landscape features are quantified in market pricing because buyers pay a premium for them.

Older property-market studies — including the Green space borders research — show that open spaces and parks have a consistently positive impact on nearby property values, with multiple prior studies documenting this effect across contexts. Quantitative real estate analyses indicate that homes within walking distance of parks or significant green space frequently sell for between 5 % and 20 % more than comparable homes without such proximity, with variation depending on park size, type, and location. Applied to my property's approximate value of \$600,000, this equates to \$30,000 to \$120,000 or more in added value attributable to nearby natural and park-like amenities that are currently present behind and beside my home. Loss of these features through development therefore represents a direct and quantifiable reduction in market value.

Beyond general green space, peer-reviewed research shows that natural open areas, water bodies, and tree-lined landscapes are especially valued because they provide multiple ecosystem services — including aesthetics, privacy, microclimate moderation, and habitat for wildlife — all of which translate to higher willingness-to-pay among buyers. The removal or visual obstruction of these features through development erases those capitalized value premiums and results in residents' homes being discounted in the marketplace relative to what they would be worth if the natural view and screening remained intact.

This loss is not incidental nor evenly distributed. It constitutes a forced wealth transfer from existing homeowners to the East Lincoln developer. The environmental amenities that currently support my property's value—river proximity, tree canopy, natural views, and quiet open space—will be destroyed for existing residents, then re-monetized by the developer through marketing language such as “river-adjacent,” “park-side living,” “nature-inspired community,” “views of the Waskasoo corridor,” or “steps from the river valley.” Academic literature recognizes this phenomenon: when public or shared environmental assets are converted into private development, the amenity value is stripped from existing properties and re-captured by new units, allowing the developer to internalize benefits while externalizing losses onto surrounding homeowners. In practical terms, East Lincoln will sell proximity to the very river corridor and tree line that currently enhance my home's value—after first degrading or obstructing those same features for adjacent residents.

The economic harm is compounded by the fact that this devaluation is permanent. Unlike temporary construction impacts, loss of a river view, tree canopy, and open riparian landscape cannot be reversed once built form is introduced. Real-estate market evidence shows that buyers apply lasting discounts to properties that have lost natural views, experienced increased density along previously open corridors, or suffered fragmentation of green space. The scientific literature makes clear that these losses are immediately capitalized into resale prices, meaning the market—not speculation—recognizes and prices this harm. As such, the East Lincoln proposal does not merely “change” neighbourhood character; it extracts tens of thousands of dollars in value from existing homes and reallocates that value to a private developer, contrary to principles of fair planning, compatibility, and protection of established residential investment.

This dynamic is not hypothetical. Broad evidence shows that proximity to parkland and high-quality green space is capitalized into housing prices because buyers are willing to pay extra for views, quiet, access to nature, privacy, and ecological quality. By contrast, when those amenities are removed, obstructed by built form, or replaced with increased density and traffic, the premium disappears and market prices adjust downward accordingly. Given my home's current value (~\$600,000), this translates into tens of thousands of dollars in lost equity that will be transferred to the developer by being able to charge increased rents rather than retained by long-term homeowners. The Board should weigh this documented economic harm alongside planning, environmental, and compatibility considerations when assessing the East Lincoln proposal.

Footnoted Citations (SDAB-Ready)

1. Chen, K., Lin, H., You, S., & Han, Y. (2022). Review of the impact of urban parks and green spaces on residence prices in the environmental health context. *Frontiers in Public Health*. Available from PMC.
2. Hobden, D. W. (2004). Green space borders — a generally positive impact of parks and open spaces on property values; study bolsters previous research. *ScienceDirect*.
3. Symons Valley Park. (2025). Green spaces in Calgary: How much does property value increase when a community recreational park is nearby? Reports that homes within 500 m of parks often enjoy 5–20% value increases.
4. Playworld / Real estate sources. Proximity to parks boosts property values between 8% and 20%, equating to tens of thousands of dollars for average home prices.

The proposed development presents a direct and unacceptable risk to traffic safety, particularly for children who regularly use the adjacent streets for walking, biking, and outdoor play. The City's own materials are internally inconsistent and demonstrably inaccurate: the site plan and supporting drawings clearly show 52 parking stalls, not the 59 stalls relied upon in the City's analysis. This error is not trivial. A conventional residential development of 49 dwelling units would typically require a minimum of 1.25 to 1.5 parking stalls per unit, equating to approximately 61 to 74 stalls, exclusive of adequate visitor parking. Under-parking of this magnitude will inevitably result in spillover parking onto surrounding residential streets, increasing vehicle circulation, reversing movements, and conflict points in an area where children are present daily. Compounding this risk, the access roadway is only 4.5 metres wide, which is approximately one metre narrower than the City's minimum standard, rendering it functionally unsafe for two-way traffic, emergency vehicle access, and pedestrian interaction. Finally, the traffic assumptions are fundamentally flawed because this is not a 55+ assisted living facility; it will generate standard multi-family residential traffic volumes, including commuting, deliveries, visitors, and service vehicles. To suggest otherwise materially understates the real traffic impacts and disregards the heightened safety risks imposed on nearby families and children.

The proposed East Lincoln development does not comply with the mandatory environmental protection requirements of the applicable Area Redevelopment Plan (ARP), the City of Red Deer Land Use Bylaw, or the Municipal Government Act (MGA). Under section 2 of the MGA, municipalities are expressly required to provide for the protection of the environment as part of their statutory planning responsibilities, and sections 617 and 632 require that development decisions be consistent with statutory plans, including ARPs, which contain binding "must" and "shall" policies. The ARP requires that development shall not adversely impact natural drainage systems, water bodies, wildlife habitat, or environmentally sensitive lands, and that environmental impacts must be fully evaluated and addressed at the development stage, not deferred through assumptions or future mitigation. The subject lands form part of the natural drainage system feeding into Gates Lake, and the conversion of permeable land and established vegetation into impervious surfaces will inevitably increase runoff volumes, flow velocities, and contaminant loading. The downstream consequences—erosion, sedimentation, nutrient enrichment, and long-term water quality degradation in Gates Lake—are foreseeable, permanent, and potentially catastrophic, yet the developer's hydrological and environmental studies do not assess full build-out conditions, cumulative impacts, or downstream effects as required by both the ARP and the MGA's environmental protection mandate. Further, the MGA obligates municipalities to consider the long-term environmental and social well-being of the community, which includes protecting established ecological assets. The site is functionally connected to the Kerry Wood Nature Centre and bird sanctuary, an environmentally significant area supporting diverse bird species, wildlife habitat, and movement corridors. ARP and bylaw provisions require that development adjacent to natural areas shall protect ecological function and habitat integrity, yet the submitted studies fail to adequately identify species presence, seasonal use, habitat fragmentation, or displacement effects. Approval based on incomplete, narrowly scoped, developer-commissioned studies is inconsistent with the MGA, disregards mandatory statutory plan requirements, and undermines the City's obligation to protect environmentally sensitive lands. The SDAB should therefore find that the development fails to meet the environmental standards imposed by the MGA, the ARP, and the Land Use Bylaw, and that the risks to Gates Lake and the Kerry Wood sanctuary are unacceptable under Alberta's planning framework.

Risk to Species at Risk:

The environmental deficiencies of the proposed development are further compounded by the failure to address impacts to species at risk known to occur or utilize habitat within the Red Deer River corridor and the Kerry Wood Nature Centre area. This region provides documented or potential habitat for several federally listed Species at Risk under the Species at Risk Act (SARA), including the Olive-sided Flycatcher (Threatened), Canada Warbler (Threatened), Bank Swallow (Threatened), and Barn Swallow (Threatened), all of which rely on intact riparian areas, mature tree canopy, open foraging space, and stable hydrological conditions. ARP policies and the Land Use Bylaw require that development shall protect wildlife habitat and ecological function, yet the studies submitted by East Lincoln do not include adequate species inventories, seasonal assessments, or habitat impact analysis for species at risk. The removal of vegetation, increased noise and lighting, and alteration of drainage patterns connected to Gates Lake directly undermine the habitat conditions these species depend upon. Proceeding without addressing these risks is inconsistent with the City's statutory obligation to protect environmentally sensitive lands and fails to demonstrate compliance with mandatory environmental policy requirements.

The East Lincoln development fails to comply with the mandatory requirements of the Land Use Bylaw governing the PS (Public Service) District and has been misclassified as "supportive living" in order to avoid the zoning, density, and locational controls that would otherwise apply to multi-family residential development. Under the LUB, development within the PS District must be consistent with the purpose of the zone, which shall be limited to bona fide public, institutional, or community-serving uses, and shall not function as general residential accommodation. Where supportive living is contemplated, the use must be defined by continuous, enforceable, and integral support or care services as an operational requirement of the land use itself, not by voluntary, revocable, or nominal services. The East Lincoln proposal does not satisfy this threshold. Instead, it consists of self-contained dwelling units that operate independently and mirror the form and function of an R3 multi-family residential building. Further, the LUB regulates land use and development form, not the personal attributes of occupants, and any assertion that the development will be restricted to "55+" residents is legally unenforceable through zoning; such a restriction cannot be policed by the Development Authority and therefore shall not be relied upon to justify approval. In the absence of enforceable supportive-living operations, the use must be evaluated based on its actual function, which is residential. Approving this development within the PS District effectively permits R3-style residential use without rezoning, contrary to the structure and intent of the LUB, and constitutes an error in interpretation. Accordingly, the Development Permit must be refused or overturned, as it authorizes a use that the PS zone does not permit and shall not accommodate.

The proposed development's massing and siting directly contravene mandatory provisions of the applicable Area Redevelopment Plan (ARP) and the Land Use Bylaw, resulting in the complete destruction of established vista views that the statutory planning framework expressly requires to be protected. The ARP clearly states that new development shall respect and preserve the visual relationship between existing residential neighbourhoods and adjacent natural features, including river corridors, mature treelines, and open space systems, and shall not introduce building forms that interrupt or wall off significant view corridors. These policies are not aspirational; they are directive. Where an application fails to protect identified vistas or materially degrades visual access to natural amenities that define neighbourhood character, the ARP requires that such development must be refused rather than conditionally approved or incrementally modified.

The proposed East Lincoln development is in direct conflict with Appendix C – Waskasoo Character Statements of Land Use Bylaw 3357/2024, which forms part of the regulatory framework adopted by the City of Red Deer. Appendix C contains mandatory direction stating that “Mature street character, scenic vistas viewable from the road, and existing natural features of the area shall be maintained.” The proposed development does not maintain these elements; rather, its height, massing, and siting obstruct established scenic vistas visible from the roadway and remove the natural features that currently define the Waskasoo streetscape. Appendix C further provides that “New development should not adversely affect the character of the streetscape, as a result of being sited too close to the road, of inappropriate or excessive Massing, form or height having a negative impact on abutting properties in terms of shadows and privacy/over look, or causing the loss of landscape features or other factors which may have a negative effect on the streetscape or abutting properties.” The East Lincoln proposal exhibits each of these prohibited impacts: it is sited in close proximity to the roadway, introduces excessive massing and height, creates significant privacy and overlook impacts on adjacent residential properties, and results in the loss of established landscape features. As such, the development fails to comply with the explicit Character Statements of Appendix C and is therefore inconsistent with the Land Use Bylaw as adopted and applied to the Waskasoo neighbourhood.

Despite this clear direction, the proposed building is sited and massed in a manner that places excessive height and uninterrupted building length directly within established sightlines from adjacent dwellings, eliminating long-standing views from principal living spaces. The ARP further requires that development shall provide appropriate height transitions, step-backs, and modulation to maintain visual permeability and prevent visual dominance over lower-density residential uses. The proposal contains no meaningful step-backs, no reduction in apparent mass, and no preservation of view corridors, demonstrating a fundamental failure to comply with these mandatory requirements.

The Land Use Bylaw reinforces this obligation by requiring that discretionary developments must be designed and sited to minimize adverse effects on adjacent properties, including loss of visual amenity, skyline interruption, and incompatibility of scale and form. The bylaw further requires that developments shall not unduly interfere with the enjoyment of neighbouring lands through visual intrusion or dominance. By fully obstructing established vista views and creating a walling effect along the neighbourhood interface, the proposal produces precisely the form of visual harm the bylaw is intended to prevent.

Taken together, the ARP and Land Use Bylaw establish a clear planning test: where massing and siting eliminate protected vistas and undermine neighbourhood character, approval is not discretionary. Because this proposal fails to preserve mandated vista views, fails to provide required transitions, and prioritizes maximum buildable envelope over statutory compliance, the ARP explicitly directs that the development must be denied. Accordingly, the application does not meet the minimum threshold for approval under the statutory planning framework and should be refused by the Subdivision and Development Appeal Board. For our family, this development would force a fundamental and permanent change in how we live in our home. The scale and proximity of the building, combined with the number of windows and balconies facing our property, would leave us with no realistic option but to keep our blinds closed throughout the day to preserve even a basic sense of privacy. That loss of privacy would also mean a loss of natural light, turning once bright and welcoming living spaces into darker, enclosed rooms and fundamentally altering the atmosphere of our home. Our children would no longer be able to play freely in the backyard or move through our home and outdoor

spaces without feeling watched, and our ability as parents to supervise them safely would be compromised by increased traffic, reduced sightlines, and the loss of the open, predictable environment we rely on today. What was once a home designed around openness, light, and connection to the surrounding green space would become a place of retreat and restriction, changing not just how our house looks, but how our family lives every single day.

The loss of protected vista views caused by the proposed development results in a direct and substantial adverse impact on my home and daily life that goes well beyond generalized neighbourhood concern. The existing views from my principal living spaces toward the river corridor, mature treeline, and adjacent open space are a defining feature of my home and a primary reason for its livability. These vistas provide natural light, visual openness, privacy buffering, and a meaningful connection to the surrounding natural environment. The proposed massing and siting would permanently eliminate these views by inserting an uninterrupted wall of building mass directly into established sightlines.

This change would fundamentally alter how my home functions on a daily basis. Living areas that are currently open, bright, and visually connected to natural features would instead face a dominant built form, resulting in a loss of daylight because of having to draw curtains for privacy, an increased sense of enclosure, and a diminished quality of indoor and outdoor living. The resulting walling effect replaces long-standing natural outlooks with visual dominance and perceived crowding, directly undermining quiet enjoyment of my property.

Importantly, this impact is permanent and irreversible. Once constructed, no amount of landscaping, fencing, or conditions of approval can restore lost vista views or re-establish the visual relationship between my home and the surrounding natural features. The Land Use Bylaw expressly requires that development shall not unduly interfere with the enjoyment of neighbouring lands, and the Waskasoo Area Redevelopment Plan is intended to prevent precisely this type of intrusive outcome. Requiring existing residents to absorb such a profound loss of residential amenity for the sole purpose of maximizing development yield is inconsistent with both documents.

The effect on my lifestyle is therefore direct, measurable, and ongoing. It diminishes how I use my home, how I experience my surroundings, and how I enjoy my property on a daily basis. This personal impact reinforces the broader planning conclusion that the proposal is incompatible with its context and fails to meet the statutory standards governing development in Waskasoo.

The proposed building imposes a towering, over-40-foot wall of intrusion that obliterates all remaining privacy and enjoyment of our home and backyard. With 24 balconies and 85 windows positioned to look directly down into our living spaces, bedrooms, and yard, our family will be subjected to constant surveillance—an inescapable sense of exposure that no fence, tree, or curtain can meaningfully mitigate. This is the backyard where our children play, where they should be free to laugh, explore, and feel safe, not grow up under the shadow of strangers watching from above. What was once a secure, private outdoor refuge becomes unusable, forcing children indoors and stripping our family of daily experiences that define a healthy home life. The building's mass rises like a concrete watchtower, an ugly, monolithic structure looming 40 feet high, dominating the skyline and casting both literal and emotional shadows over our property. This is not compatible living; it is an overwhelming, permanent imposition that replaces peace, safety, and dignity with anxiety and loss, fundamentally and irreversibly destroying our privacy and quality of life.

This unit will not merely inconvenience our family; it will permanently erase the way we live, gather, and find joy together. The simple moments that define family life—children playing freely in the backyard, riding their bikes and exploring the adjacent area, shared meals outdoors, and quiet evenings without fear of being watched—will be lost forever. What should be a safe, open extension of our home becomes a space of constant exposure and restraint, forcing our children to retreat indoors and teaching them, far too early, that even their own neighbourhood is not truly theirs to enjoy. There is no future adjustment, landscaping, or condition that can restore what is taken once this building is erected. The harm is ongoing and irreversible, stripping away daily experiences that shape childhood, family connection, and a sense of safety. Our family enjoyment is not merely reduced; it is permanently destroyed, leaving behind a lasting absence where freedom, comfort, and peace once defined our home and surrounding area.

Question to ask City Administrators

1. Yes or no: Under the Land Use Bylaw, development in the PS (Public Service) District must be limited to public and quasi public uses, correct?
2. Yes or no: The Land Use Bylaw does not regulate or enforce the age of occupants, including “55+” restrictions, correct?
3. If age restrictions cannot be enforced through zoning, what specific bylaw provision prevents this building from operating as a general-market apartment in the future?
4. Yes or no: The Waskasoo Area Redevelopment Plan states that development shall preserve established vista views from the road and visual relationships with the river corridor.
5. Please identify the exact ARP policy that authorizes approval of a building that fully obstructs existing residential sightlines to the river corridor.
6. Yes or no: The Land Use Bylaw requires discretionary developments to minimize adverse effects on adjacent properties, including loss of privacy and enjoyment.
7. How does a design containing 24 balconies and 85 windows directly overlooking neighbouring homes minimize adverse effects, as required by the bylaw?
8. Yes or no: Once the building mass and height are constructed, loss of privacy and vista views cannot be reversed through conditions or landscaping.
9. If ARP “shall” policies are not met, what legal authority allows the Development Authority to approve the application rather than refuse it.
10. Yes or no: Approving this development as proposed establishes a precedent allowing apartment-style residential buildings within PS-zoned land without rezoning.

Questions for the Developer

1. Yes or no: At the time you purchased this property, you were aware that it is located within the Waskasoo Area Redevelopment Plan, an area specifically intended to protect river corridors, green space, and established neighbourhood character, correct?
2. Yes or no: Despite knowing these protections existed, you designed a building exceeding 40 feet in height that introduces a continuous wall of mass directly adjacent to low-density, river-oriented homes.
3. Prior to submitting this application, did you meet with, notify, or meaningfully consult any residents of the Waskasoo neighbourhood whose homes directly overlook or are

adjacent the site ?

4. Yes or no: You did not hold a community information session, circulate design concepts to affected residents, or attempt to co-develop a lower-impact alternative that preserved established river and green-space views.
5. Given that the Waskasoo ARP requires development to respect and preserve visual relationships with the river corridor, please explain how eliminating those views entirely for adjacent families complies with that obligation, rather than prioritizing maximum building envelope.
6. Yes or no: Were you aware that this design would permanently eliminate backyard privacy, children's play space usability, and long-standing enjoyment of the green corridor for neighbouring families, including those directly below 24 balconies and 85 windows.
7. Yes or no: Did you treat the Waskasoo river corridor as a protected community asset to be preserved or as a marketing backdrop—something to be built against, looked over, and monetized—while the impacts to existing Waskasoo families were accepted as collateral damage.
8. Yes or no: Isn't it true that you chose a building design that maximizes height and unit count, knowing it would permanently eliminate the daily use and enjoyment of the adjacent green corridor for surrounding families, and that you made that choice without first engaging the community or properly testing lower-impact alternatives that would have respected the Waskasoo neighbourhood character?
9. Please explain how 24 balconies and 85 windows overlooking adjacent homes do not result in permanent privacy intrusion
10. Yes or no: Once constructed, the loss of neighbouring residents' privacy, backyard usability, and vista views is permanent.
11. Yes or no : This is the first of two buildings, as stated by members of you staff.

A deeply concerned citizen, Shelby Smith

Rebuttal to the city's recommendations,
am writing to raise serious concerns regarding the conduct of City Administration in this appeal and the content of the Authority Submission filed on behalf of the City. The issues before you are no longer limited to planning disagreement. They now raise questions of institutional bias, ethical failure, and disregard for binding statutory instruments, specifically the applicable Area Redevelopment Plan (ARP) and the Land Use Bylaw (LUB).

The Municipal Planning Commission (MPC), acting as the Development Authority, refused this application based on clear and defensible non-compliance with the Waskasoo Character Statements. Those Character Statements form part of the statutory planning framework and, under the LUB, prevail where conflict exists. That refusal was lawful, policy-based, and within the discretion granted to the Development Authority.

The City's Authority Submission does not defend that decision.

Instead, it systematically works to undermine it.

Throughout the submission, Administration minimizes or recharacterizes mandatory ARP and Character Statement requirements as discretionary or subjective. "Should" provisions are

treated as optional preferences rather than binding policy unless properly justified. This is a misstatement of the law and a direct contradiction of the LUB, which expressly elevates the Character Statements above base zoning standards.

This alone is a serious legal error. But it is not isolated.

The submission repeatedly relies on numeric zoning compliance—setbacks, height limits, parking counts—as though those metrics override qualitative ARP requirements relating to massing, streetscape character, scenic vistas, privacy, and interface. They do not. The Municipal Government Act is explicit: discretionary uses may be refused even when technical standards are met. Administration’s framing invites the Board to do what the law does not permit—treat statutory plans as optional obstacles rather than binding direction.

More troubling is the selective and biased handling of evidence.

Community impacts are consistently described as “perceived” or informal, while applicant assertions regarding traffic, safety, mitigation, and infrastructure are accepted without studies, audits, or expert evidence. This asymmetry is not neutral analysis. It is advocacy.

The submission also relies on incorrect factual baselines to minimize impacts. For example, the proposed building’s scale is normalized through comparison to Gateway School using an incorrect height. Gateway School is approximately 8 metres tall. The appealed development materially exceeds that height. This error directly affects the massing and compatibility analysis and further undermines the reliability of the City’s conclusions.

Administration then suggests that any remaining deficiencies can be resolved through conditions of approval. This is another legal error. Massing, orientation, scale, and siting are fundamental design elements. They are not condition-adjustable details. Conditions cannot be used to retroactively cure conceptual non-compliance with an ARP or Character Statements.

Finally, the Authority Submission repeatedly introduces irrelevant considerations, including generalized senior housing need. Need is not a planning test under the ARP or LUB. It does not justify ignoring binding policy. Its inclusion serves only to tilt the analysis toward approval.

Taken together, these issues demonstrate a pattern of conduct:

- downgrading statutory plans,
- misstating the legal hierarchy of planning, instruments,
- minimizing impacts identified by the Development Authority,
- selectively framing facts to favour the applicant,
- and advocating approval pathways instead of objectively assisting the Board.

This pattern gives rise to a reasonable and troubling conclusion: City Administration is acting in a manner that is biased toward East Lincoln Properties, at the expense of the ARP, the LUB, and the integrity of the planning process itself.

The role of Administration is not to rescue a refused application or re-litigate policy through opinion. Its duty is to apply adopted statutory instruments fairly, consistently, and ethically. In this case, that duty has not been met.

For these reasons, I respectfully submit that the Authority Submission should be afforded little to no weight, and that the Board should rely instead on the Municipal Planning Commission's refusal, which is grounded in binding statutory policy and proper application of the law.

The integrity of the ARP and the Land Use Bylaw depends on their consistent application—particularly when powerful developers are involved. Anything less erodes public trust and undermines the legitimacy of the planning system.

Further compounding these concerns is Administration's unethical disregard for protected vista views, loss of privacy, and loss of residential enjoyment, all of which are expressly safeguarded by the Waskasoo ARP and incorporated into the Land Use Bylaw.

The Municipal Planning Commission identified scenic vista obstruction, privacy intrusion, and adverse streetscape interface as central reasons for refusal. These are not subjective preferences. They are core planning interests explicitly protected by statutory policy. Vista protection, overlook, and privacy are mandatory considerations under the Waskasoo Character Statements and directly engage the Municipal Government Act's test for material interference with the use and enjoyment of neighbouring lands.

Despite this, the Authority Submission:

- minimizes the loss of scenic vistas caused by block-like massing,
- dismisses privacy impacts arising from scale, orientation, balconies, and window placement,
- and reframes the loss of residential enjoyment as “perceived” or informal.

This treatment is not only legally flawed—it is ethically indefensible.

Administration has a duty to objectively evaluate and present impacts that materially interfere with residents' use, enjoyment, and value of their homes. Instead, these impacts are selectively ignored, downplayed, or recharacterized in order to advance an approval narrative. This approach strips mandatory policy protections of any real meaning and signals that resident impacts are secondary to developer outcomes.

The cumulative effect is a submission that fails to acknowledge, let alone properly weigh, the very harms the ARP and LUB were adopted to prevent. When Administration disregards protected vista views, privacy, and enjoyment—while simultaneously advocating approval—it crosses from flawed analysis into unethical bias.

This failure further supports the conclusion that the Authority Submission cannot be relied upon and should be afforded little to no weight by the Board.

Questions for Jay Hallet

1. Statutory Hierarchy

- You agree the Waskasoo Character Statements prevail over base zoning where conflict exists—can you point the Board to where your submission applies that hierarchy, rather than subordinating those Statements to numeric standards?

2. “Should” vs. Mandatory Compliance

- In your submission, you treat “should” provisions as discretionary. Can you identify the policy authority that permits non-compliance with a “should” requirement absent a defensible planning rationale accepted by the Development Authority?

3. MGA Interference Test

- Where in your analysis do you apply the Municipal Government Act test for material interference with neighbouring use and enjoyment, separate from whether setbacks and height limits are met?

4. Incorrect Comparator Facts

- You rely on comparisons to Gateway School to normalize scale. Do you acknowledge Gateway School is approximately 8 metres tall, and if so, how does using an incorrect height affect your massing conclusions?

5. Vista and Privacy Protections

- The MPC identified scenic vista obstruction and privacy intrusion as refusal grounds. Can you explain why your submission minimizes those impacts despite their explicit protection in the Waskasoo framework?

6. Asymmetric Evidence

- Community impacts are described as “perceived,” yet applicant claims on traffic and safety are accepted without studies. What objective standard did you apply to weigh those two sets of evidence differently?

7. Conditions as Cure

- You suggest conditions could address massing, orientation, and siting. Can you cite authority that permits conditions to cure conceptual design non-compliance with a statutory plan?

8. Irrelevant Considerations

- Your submission references senior housing need. Can you identify where “need” appears as a decision test in the ARP or Land Use Bylaw?

9. Ethics and Neutrality — “The Closer”

- You are known by the nickname “The Closer.” Do you believe it is ethical for a Development Officer to carry a reputation suggesting outcomes are driven toward approval, and how does that align with your duty of neutrality to the Board?

10. Ethics and Perception of Bias — “The Closer”

- Given this nickname, what safeguards did you apply in this file to ensure your analysis did not advocate for approval or undermine the Development Authority’s refusal, but instead neutrally applied the ARP and LUB?

Thank you for your careful consideration.

Respectfully submitted,

[REDACTED]

Rebuttal to the Appellant,

SDAB [006 2025 / 4240 – 59](#) Street, Red Deer

Errors of Law and Policy in Appellant’s Memorandum of Law

Members of the Subdivision and Development Appeal Board,

This submission identifies material legal and planning errors in the Appellant’s Memorandum of Law dated January 26, 2026, filed on behalf of East Lincoln Properties Corporation. Each error below is tied to specific, binding provisions of the Waskasoo Area Redevelopment Plan (ARP), the City of Red Deer Land Use Bylaw, and the Municipal Government Act (MGA).

1. Misapplication of ARP Objectives

ARP s.2.1 (Objectives) / MGA s.635(1)

The Appellant asserts that ARP objectives “establish the parameters” within which all other policies must be interpreted and that interpretations inconsistent with those objectives must be rejected.

Error:

ARP objectives in s.2.1 are introductory and contextual only. Under MGA s.635(1), an Area Redevelopment Plan is a statutory plan whose policies are binding, including detailed provisions and appended Character Statements. Objectives cannot override or neutralize mandatory policies, particularly where the ARP uses “shall” language.

2. Improper Downgrading of Mandatory “Shall” Policies

ARP s.1.2 (Policy Language Interpretation)

The Appellant repeatedly characterizes ARP and Character Statement requirements as “recommendations.”

Error:

ARP s.1.2 explicitly states:

- “Shall” = must be followed
- “Should” = required, with limited discretion
- “May” = discretionary

Despite citing this section, the Appellant treats multiple “shall” statements—particularly those related to vistas, streetscape, massing, and privacy—as optional. This is a direct contradiction of ARP s.1.2 and an error of law.

3. Illegal Restriction of Scenic Vista Protection

ARP Appendix C – Waskasoo Character Statements, Environmental Character Area

Section 5.6(2)

The Character Statement requires:

“Mature street character, scenic vistas viewable from the road, and existing natural features of the area shall be maintained.”

Errors:

- The Appellant improperly limits “scenic vistas” to narrow, roadway-only sightlines.
- The ARP does not restrict vistas to vehicular viewpoints.
- The phrase “shall be maintained” in s.5.6(2) is mandatory and applies to the character of the area, not merely tree retention.

This interpretation improperly strips the term “vista” of its planning meaning and defeats the intent of the Environmental Character Area designation.

4. Exclusion of Adjacent Residential Impacts

ARP s.2.1(1) / Character Statements s.5.6(15)

The Appellant claims that residential lands south of 59 Street are irrelevant because they are in a different Character Area and do not “abut” the site.

Error:

- ARP s.2.1(1) requires development to be sensitive to existing neighbourhood character, not merely the parcel itself.

- Character Statement s.5.6(15) requires new development to avoid negative impacts on abutting properties, including shadows, privacy, overlook, and massing.

The ARP does not authorize exclusion of affected properties simply because a roadway intervenes.

5. Misuse of the Zoning Definition of “Abutting”

Land Use Bylaw s.1.0 (Definitions)

The Appellant relies on the definition of “abut” in the Land Use Bylaw to exclude consideration of nearby homes.

Error:

The definition of “abut” in LUB s.1.0 applies primarily to dimensional regulations (setbacks, site coverage). It does not govern ARP character analysis, privacy, shadowing, or visual dominance.

Using a zoning definition to defeat ARP impact analysis is a category error and inconsistent with planning law.

6. Legally Irrelevant Density Comparisons

ARP s.2.1 / Land Use Bylaw s.9.40 (PS District)

The Appellant argues that the proposal is acceptable because its unit density is lower than the maximum density theoretically permitted in RL zones south of 59 Street.

Error:

- Density permissions in RL zones are irrelevant to PS-zoned lands.
- LUB s.9.40 permits discretionary uses but does not displace ARP compliance.
- The ARP does not establish density as the controlling metric; form, massing, height, and character are determinative.

This argument is legally immaterial to ARP conformity.

7. Misstatement of Environmental Conditions

ARP s.2.1(3) / Character Statements Part 5

The Appellant states the site contains “no environmental features.”

Error:

The site is expressly identified within the Environmental Character Area under Character Statements Part 5, adjacent to:

- Kerry Wood Nature Centre
- Gaetz Lakes Sanctuary

- Recognized wildlife corridors

This directly contradicts ARP s.2.1(3), which requires preservation of environmental features, and undermines the credibility of the submission.

8. Absence of Corridor-Scale Environmental Analysis

ARP s.2.1(3) / MGA s.622, s.635

While referencing servicing and drainage studies, the Appellant provides no corridor-scale or cumulative environmental assessment.

Error:

Given the Environmental Character Area designation, compliance with ARP s.2.1(3) requires more than site-specific engineering clearance. The MGA (s.622, s.635) supports broader environmental consideration where statutory plans identify sensitive areas.

9. Misuse of

Rizzo & Rizzo Shoes Ltd. (Re)

Statutory Interpretation Principles

The Appellant relies on Rizzo to argue that strict application of vista protection would create a “legal absurdity.”

Error:

Rizzo supports purposive interpretation within statutory limits, not the nullification of explicit “shall” requirements. Using Rizzo to override ARP s.1.2 and s.5.6(2) is legally unsound.

10. Incorrect Assertion That SDAB Cannot Consider Loss of Informal Open Space

MGA s.640 / ARP s.2.1

The Appellant claims that loss of informal community open space is beyond the Board’s jurisdiction.

Error:

Under MGA s.640, the SDAB has authority to consider:

- Compliance with statutory plans
- Neighbourhood character
- Public interest impacts

Informal open space value directly relates to ARP s.2.1(2) and (3) and is squarely within the Board’s mandate.

11. Administrative Support Does Not Cure Non-Compliance

MGA s.640 / ARP s.1.2

References to City Administration support are repeatedly advanced.

Error:

Administrative opinion cannot override:

- Mandatory ARP policies (s.1.2)
- Statutory interpretation requirements
- The SDAB's independent, de novo jurisdiction under MGA s.640

12. Irrelevant Allegations of “Political” MPC Influence

MGA s.640

The Appellant's characterization of the MPC decision as political is irrelevant.

Error:

The SDAB's task under MGA s.640 is to assess statutory compliance, not to re-litigate motivations or speculate on governance dynamics.

Land Use Bylaw s.9.40 (PS District – Permitted and Discretionary Uses)

Under the City of Red Deer Land Use Bylaw, a Supportive Living Accommodation / Assisted Living Facility is not a permitted use on PS zoning. It is explicitly a discretionary use, which means:

- The development authority must exercise discretion in determining whether the proposal fits the intent of the district and all applicable plans.
- Discretionary approval is not automatic simply because a use appears on a list; compliance with statutory plans (e.g., ARP, Character Statements) is required as part of that exercise of discretion.

Despite this, the Appellant repeatedly frames the facility as if it is a “right” or “expected” outcome for the site, rather than a discretionary proposal that must demonstrate conformity with all binding policy instruments, including mandatory ARP provisions such as scenic vista protection, environmental character, massing impacts, and neighbourhood compatibility.

This is a mischaracterization of how discretionary uses are evaluated under the Land Use Bylaw and Alberta planning law.

At the Municipal Planning Commission hearing, the Appellant’s representative asserted that the “community wants nothing developed on this site.” This is factually incorrect.

Fact:

Multiple residents — including myself — affirmed openness to development that was consistent with the City’s existing planning framework, ARP Objectives & Policies, and Character Statements. Our position was not opposition to all development, but opposition to non-conforming development that fails to protect neighbouring visual character, vistas, privacy, and environmental context.

Residents expressed explicit support for:

- Development aligned with established road/urban form guidelines,
- Context-sensitive massing and height,
- Retention of natural features and scenic vistas,
- Low-impact infill consistent with ARP and Character Areas.

These community positions were documented in written submissions and direct testimony at the MPC hearing. The Appellant's blanket statement to the contrary was misleading and should be corrected for the SDAB record.

The Appellant's submission asserts that the Municipal Planning Commission ("MPC") decision was "highly influenced by political considerations." That assertion is unsupported, inaccurate, and contradicted by the record of the MPC hearing.

The MPC's decision was expressly grounded in:

- The Waskasoo Area Redevelopment Plan (ARP);
- The Land Use Bylaw, including mandatory "shall" provisions;
- The application's failure to adequately address massing, siting, scenic vistas, neighbourhood character, and environmental context as required by those instruments.

Commissioners repeatedly referenced specific ARP and bylaw requirements during deliberations, including the Environmental Character Statements and their mandatory policies. The decision reflects a statutory planning analysis, not political preference. No evidence has been provided that political motivations influenced the MPC's findings.

Under Alberta planning law, a decision that applies binding statutory instruments cannot be characterized as "political" merely because it results in refusal.

In contrast, the conduct of City Administration throughout the development permit process raises legitimate concerns regarding procedural fairness, neutrality, and statutory compliance.

City Administration:

- Repeatedly emphasized discretionary language (“should”) while minimizing or disregarding mandatory “shall” provisions of the ARP, contrary to ARP s.1.2;
- Framed the proposal as an expected or appropriate outcome due to zoning alone, despite the use being discretionary and subject to full ARP compliance;
- Failed to meaningfully address neighbourhood-scale impacts, including scenic vistas, privacy, shadowing, and visual dominance, which are explicitly required considerations under the ARP and Character Statements;
- Accepted consultant materials and studies submitted by the applicant without independent scrutiny proportionate to the site’s designation within an Environmental Character Area.

This pattern demonstrates not a neutral evaluation, but an outcome-oriented approach inconsistent with the Development Authority’s obligation to provide an objective and unbiased assessment.

Concerns regarding the impartiality of City Administration in this matter are not speculative. A formal request has been made for a review of the relationship between East Lincoln Properties and the Planning Department, based on:

- Repeated departures from standard interpretive practice when applying ARP policies;
- Consistent alignment of administrative conclusions with the applicant’s legal framing, even where that framing conflicts with mandatory statutory language;
- The failure to clearly present ARP non-compliance risks to decision-makers at

MPC.

These concerns go directly to procedural fairness, a foundational principle in land use decision-making. While the SDAB is not tasked with adjudicating ethics complaints, it is entitled — and obligated — to consider whether the record before it reflects a balanced and lawful application of planning instruments, particularly where administrative recommendations appear to selectively interpret statutory requirements.

Under MGA s.640, this Board sits de novo and must independently assess compliance with statutory plans and bylaws. The Board is not bound by administrative opinion, particularly where that opinion:

- Minimizes mandatory policies;
- Excludes affected neighbourhood impacts;
- Treats a discretionary use as if it were a permitted entitlement.

In this context, the MPC decision reflects a correct application of the ARP and Land Use Bylaw, while the administrative recommendation does not. The Appellant's attempt to recast this statutory analysis as "political" should be rejected.

Conclusion

The Appellant's Memorandum systematically:

- Misstates the legal force of "shall" policies,
- Narrows ARP protections without textual support,
- Excludes affected residents and environmental systems from required analysis.

When properly interpreted and applied, the Waskasoo Area Redevelopment Plan, the Land Use Bylaw, and the Municipal Government Act do not support approval of this development as proposed.

Respectfully submitted,

[REDACTED]

