



Subdivision & Development Appeal Board

Exhibit D.5

Area Land Owner Submissions



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.



Chair of the Board of Trustees



February 4, 2026

Red Deer Subdivision and Appeals Board

Re: Development Permit Application for 4240 59 St

To Whom it May Concern,

My name is [REDACTED], and as a resident of Waskasoo and a parent of Gateway School students, I am writing to oppose this development application.

I stand in full agreement with many of the letters already submitted from my community and neighbours who live on the surrounding properties. While I share concerns about traffic, environmental impact, and the integrity of the ARP Character Statements, I would like to highlight several additional issues that I believe warrant serious consideration.

1. Impacts on the enjoyment and use of my property

The proposed building's height and massing—particularly the third-floor units—will directly overlook my backyard. At the hearing, the Appellant's lawyer indicated that there is "no easement on light," and although that is true, the infringement of my backyard privacy does play a large factor in the enjoyment of my property. This is not just a minor inconvenience. It fundamentally alters how I would live in and enjoy my home. If I must keep my curtains closed for privacy, that changes how I experience my living space. If I must plant trees or hedges to shield my yard, that restricts how I can garden and use my property. The sense of safety and comfort that comes from having a private backyard—something that is central to why many of us live in this neighbourhood—would be diminished. These are real, tangible impacts on daily life, not abstract concerns.

2. Complete absence of consultation

I also want to note the complete absence of consultation by the developer throughout this years-long process. I was surprised to hear the developer indicate all the ways that they have consulted the residents.

After the property was purchased and the developer was making their intentions known for the scale of development, they hosted a Virtual open house event available on two separate days. However, this was in a Zoom format where the unmute function was disabled, and the interactive portion involved providing questionably worded, misleading questions for feedback. The report of the Q&A responses provided afterwards showed overwhelming opinions against, and I am curious if the appellant and I were reading the same report. Not allowing space to hear and listen to one another, but instead providing a one-way conversation with tightly controlled questions, is not consultation.

As far as I am aware, at no point has there been outreach to discuss concerns, alternatives, or design changes face-to-face. There has been no attempt to work collaboratively with the neighbourhood or to explore options that might better respect the surrounding context.

I was concerned hearing that one of the cases of ‘consultation’ included hearing the opinions at public hearings. Public hearings cannot be considered as good faith consultation. This lack of engagement has been deeply disappointing. We are not opposed to development — but we expect it to be done thoughtfully, with the surrounding community accounted for. That has not occurred here.

3. Neighbourhood involvement should not be dismissed

The developer has been quick to dismiss concerns as “emotional” or “inspirational.” We are not showing up at hearings to make emotional pleas, but express sound logic and thoughtful arguments. We do our best to uphold decorum and conduct ourselves professionally.

The sustained level of neighbourhood involvement should not be minimized. Residents have invested countless unpaid hours researching policies, writing letters, attending hearings, and showing up again and again. We are busy individuals who are active in many other parts of the community. Personally, I help facilitate the community gardens, and our neighbourhood association contributes extensively to community-building initiatives. We would much rather be spending our time and energy on those positive efforts. The fact that so many residents continue to show up over the years speaks to how significant and disruptive this proposal is. This is a neighbourhood that is already stretched thin, repeatedly raising the same concerns because they remain unaddressed. The constant push for a large-capacity development, despite consistent opposition, has been exhausting and, frankly, feels tone-deaf.

4. Housing demand and the mismatch with actual needs

It is true that we are in a housing crisis and that more housing is needed. However, in the realm of seniors’ housing, the greatest unmet need is for **subsidized** or **affordable** units. The Bridges Community, which operates at least five residences in Red Deer, currently has waitlists ranging from six months to three years. In contrast, several independent senior apartments—such as Three Robins, Victoria Park, and Inglewood—have confirmed vacancies. Some of these facilities indicated they could house new residents within 30 days. The proposed development does not address the affordable housing gap and, based on current supply and demand.

5. Misleading framing of “supportive living”

Although the building is described as “assisted living,” the developer’s own promotional materials emphasize “independent living.” Residents will largely be living independently, accessing the same services that any senior in any home can already access—meals, groceries, medical care, prescriptions, and personal services can all be delivered. We live in a world where there is an app for everything, and home delivery for all the necessities is commonplace. We should not be led to believe this proposed development is something more specialized than it is.

As mentioned above, the Bridges Community residences, Three Robins, Inglewood, and Victoria Park are all built on land zoned R-H to R-M. We have not used PS land in the past for independent senior living facilities. With the recent bylaw change allowing supportive living facilities as a discretionary use on PS land, we must ask: what distinguishes these buildings from standard high-density residential developments? Services are minimal. If the inclusion of a hairdresser or visiting nurse qualifies a building as “independent living,” then the distinction becomes paper-thin.

Within the scope of Red Deer, all of the facilities listed above (in section 4) and in my presentation offered *significantly* more services than this development would. Three Robins was mentioned in Red Deer as an example in both my presentation and that of the appellant. This is a beautiful independent Sr living facility downtown in Red Deer that provides many wonderful amenities. However, my favourite part about the Three Robins example is that it is built on land zoned R-H, which is high-density residential. We have not run out of R-H land in the city, and therefore do not need to sacrifice PS land for a building that does not appear to be even providing the bare minimum to be considered 'Supportive Living'.

Furthermore, I was confused why the appellant referred to this property as a "bridge" to more supportive living options or a "gateway to supportive living". This sounds to me like an acknowledgement of the lack of support. If what they are providing is not fully "Supportive living" then it should not be considered as fulfilling the criteria for the discretionary use.

5. PS Zoning Review

The changes to the PS zoning definitions have been a source of concern and discussion for a few years. I understand that the SDAB's role is to apply the definitions as they exist on the day of your decision, and for that reason, I had intentionally left this issue out of my presentation. However, the appellant's comments about how the City is responding to evolving bylaws require a broader perspective.

When the appellant purchased this parcel, it was zoned PS, and supportive living facilities were not a discretionary use. The developer acquired the land with full knowledge that development options were limited under the zoning in place at that time. The City then undertook a Land Use Bylaw review, including public consultation, and completed Phase 1, which focused on residential zones. Phase 2 — which includes PS and other "Other" zones — is still upcoming and is expected to involve full public engagement.

Despite this, changes to the PS definitions were made outside of that formal review process and without consultation. This issue has been raised with City Councillors because these unreviewed changes effectively opened the door for large-scale "Supportive living" residential-type developments to be considered as discretionary use on specialized PS-zoned land, which is precisely the situation we now find ourselves in. At MPC, Councillor Krahn brought forward a motion to City Council to "review the definitions of supportive living accommodations and increase the requirements of support provided onsite within the City of Red Deer's Zoning Bylaw." Clearly, this conversation is ongoing and unresolved.

The appellant expressed dismay that such a review is taking place and suggested it pertains only to this parcel. That is incorrect. This is a city-wide issue that affects all privately held PS land. It is also worth noting that the appellant raised no concerns when the PS definitions were changed in a way that enabled supportive living as discretionary uses on this site.

This is not a NIMBY issue. The broader question is: if we allow this development here, are we prepared to allow similar large-scale developments on PS land across Red Deer? That is the nature of precedent.

6. A path forward

Waskasoo is a unique neighbourhood, and this lot requires *nuanced* consideration. It is difficult to justify using such a distinctive parcel of land for a development that is oversized, under-demanded, and out of step with the neighbourhood's values.

I believe the neighbourhood would welcome the opportunity to work collaboratively with the developer, the City, and the broader community toward a solution that respects the neighbourhood's character and capacity.

I respectfully urge you to deny this application.

Sincerely,

[REDACTED]

[REDACTED]

P.S. In response to your question on February 4 regarding the different types of supportive living (Types A, B, C, etc.): these classifications are defined by Alberta Health Services as part of the continuing care system. I have attached a PDF outlining these categories, and additional information is readily available online. It is important to note that these classifications apply to continuing care and long-term care facilities, where the level of support is clearly defined and regulated. These are the types of accommodations that are in very high demand, and they are where the long waitlists typically exist.

Types of Care

Continuing Care

Alberta Continuing Care Act Effective April 1, 2024

References to continuing care (including home care, designated supportive living, long term care and hospice) may not reflect the updated language or terms found in the new Alberta Continuing Care Act effective April 1, 2024. Refer to the [Continuing Care Glossary](#) for definitions.

Spaces Accessed Through

Site Directly

Spaces that are accessible through the site directly are licensed by the Government of Alberta and provide accommodation with a range of amenities and services depending on the site.

Examples include [seniors lodges](#).

Access

These types of spaces are accessed directly through the site by contacting the operators.

Fees

In these sites, accommodation charges are set by the operator and vary from site to site.

You can receive an assessment for home and community care services at your supportive living accommodation if you have a valid Alberta Health Care insurance number (aka healthcare card). Home and community care services are provided by AHS or by care operators who are contracted by AHS to provide care with oversight from AHS.

Supportive living operators may also offer health and personal care services for a fee. Note that AHS does not provide oversight for services obtained directly from a site.

Types of Spaces

- **Supportive Living Accommodation**
[Supportive Living](#) provides rooms, suites, and support services geared to low-income adults over 65 years old to stay independent. [Seniors lodges](#) are one type of supportive living accommodation.

AHS Case Manager

Spaces accessed through an [AHS Case Manager](#) include **Type A**, **Type B** and **Type B - Secure Spaces**.

Access

Access is determined by AHS based on an individual's assessment. Care is provided by AHS or by care operators who are contracted with AHS to provide care with oversight from AHS.

Fees

The health and personal care services provided at these sites are paid by AHS, and residents are responsible for paying the accommodation charge.

Types of Spaces

- **Type A**
[Continuing Care Homes Type A](#) (formerly long-term care, including nursing homes and auxiliary hospitals) provide on-site health and personal care for the most complex needs by health care aides (HCAs), licensed practical nurses (LPNs), and registered nurses (RNs)
- **Type B**
[Continuing Care Homes Type B](#) (formerly designated supportive living) provide on-site health and personal care for more complex needs by health care aides (HCAs) and licensed practical nurses (LPNs)
- **Type B - Secure Spaces**
[Continuing Care Homes Type B - Secure Spaces](#) (formerly designated supportive living, dementia) provide on-site health and personal care with specialized dementia care in a secure environment.

Zone Palliative Teams

Spaces accessed through zone palliative and end-of-life care teams include **Type C (hospice)**.

Access

Access is determined by [zone-based palliative and end-of-life care teams](#) based on an individual's assessment. Services are provided by a specialized interprofessional palliative care team.

Fees

Hospice care is a [palliative care](#) publicly funded program. There is no daily accommodation fee charged to the individual or family for hospice care. Some fees may include medication and oxygen.

Types of Spaces

- **Type C (hospice)**
[Continuing Care Homes Type C \(hospice\)](#) provide 24-hour on-site health and personal care by specialized healthcare professionals, support staff, and volunteers who work together.

From: [REDACTED]
To: Appeals
Subject: [External] SDAB 006 2025
Date: February 05, 2026 2:30:08 PM

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

To the attention of the Red Deer Subdivision and Appeals Board,

I write this letter in opposition to the proposed development at 4840 59 St. Red Deer. My name is [REDACTED], and I am a homeowner in the Waskasoo neighborhood, living approximately 100 meters from the Public Service property East Lincoln Developments is looking to develop into a "supported living" residence. My concern is traffic. Those who send their kids to either Gateway Christian school (750 students), École Camille J. Lerouge School (620 students) or Lindsay Thurber high school (2,000 students), three large schools located within the Waskasoo neighborhood, can appreciate the traffic congestion and risk to the public that this large development will add to the already congested neighborhood traffic. While the main concerns are during peak traffic times (morning school drop off and afternoon pick up), to disregard these peak traffic times as stickily focus on an "average" traffic distribution on these roads brings risk to all users of this neighborhood, including the proposed seniors that would live in this supportive living development. This neighborhood, developed in the 1950's, does not have the benefit of modern traffic planning and design features. With vehicle line ups at the two traffic lights controlling access to the neighborhood, extending wait times through multiple cycles of the lights at these peak times, there is a high risk that emergency services will not be able to access the neighborhood when an emergency happens. This severe traffic congestion remains after the City of Red Deer has already implemented traffic flow improvements over the past three years. Removing the available frontage area along 59th St for the proposed entrance to the development will mean that Gateway school will need to come up with an alternative location for the loading of school buses which currently extends all the way down 59 St from the front entrance of Gateway to community mailbox located near 45 Ave. Navigating these narrow single lane roads with winter snow pack as we just experienced makes this even more treacherous.

I hope this paints a realistic picture for what those who utilize the Waskasoo neighborhood experience. This is a far cry from what those who are paid to represent the developer portray in their descriptions to the appeals board.

Respectfully submitted,

[REDACTED]