



CITY OF  
*Lethbridge*

Office of the City Clerk

March 29, 2023

**RE: NOTICE OF HEARING - SUBDIVISION AND DEVELOPMENT APPEAL BOARD**

An appeal has been filed against the Development Permit issued by the Development Officer on March 1, 2023 to allow for a change of use for a portion of the building to allow supportive housing for a maximum of 25 residents at 221 2 Avenue South.

When an appeal is filed with the Subdivision and Development Appeal Board (SDAB), all persons who own property within 200 feet or 60 meters of the development are notified of the hearing by way of this letter. In addition, the owner of the property will also receive a copy of this letter.

The Subdivision and Development Appeal Board (SDAB) will hold a Public Hearing as follows:

**DATE:** Thursday, April 27, 2023  
**TIME:** 5:00 p.m.  
**LOCATION:** Council Chambers, Main Floor, City Hall  
910 – 4 Avenue South

Persons affected by this development have the right to present a written, verbal and/or visual submission to the Board. When making a presentation, keep in mind that in accordance with the legislation that governs the SDAB, the Board can only consider relevant planning matters when rendering its decision. It is recommended that you limit your presentation to five minutes.

If you wish to submit written material to the Board, it should be delivered to the Secretary of the SDAB via email at [david.sarsfield@lethbridge.ca](mailto:david.sarsfield@lethbridge.ca), **including your full name and mailing address** no later than 12:00 noon on the Tuesday prior to the hearing. If you are unable to meet this submission deadline, please bring 12 copies of the materials to the Hearing and it will be distributed at the start of the Hearing. Any written and/or visual material received will be made available to the public.

We will be pleased to answer any questions you may have regarding the appeal and can also provide information or advice on Board procedures and how to make presentations to the Board. Please feel free to contact me at 403 329 7329 if you have any questions.

Yours truly,

David Sarsfield  
Board Secretary,  
Subdivision and Development Appeal Board



CITY OF  
*Lethbridge*

**NOTICE OF APPEAL**  
Subdivision & Development Appeal Board

In accordance with sections 678 and 686 of the *Municipal Government Act* and The City of Lethbridge Bylaw 4749, an appeal to the Subdivision and Development Board must be filed within the legislated time frame.

<b>Site Information</b>		(Date Received Stamp)
Municipal Address of Appeal 221-2 AVENUE SOUTH, LETHBRIDGE		
Legal Description of Site (must be completed for subdivision appeals)		
Development Application Number or Subdivision Application Number DEV 14368		
<b>Appellant Information</b>		
Name EDWARD & KAREN BETTS		(Office use Only)
Mailing Address #327-100-2 AVENUE SOUTH		
City LETHBRIDGE	Province AB	
Residence # 403-380-4279	Business # 403-393-3486	Email tkbetts123@gmail.com

**APPEAL AGAINST** (Check One Box Only) for multiple appeals you must submit another Notice of Appeal

<b>Development Permit</b>	<b>Subdivision Permit</b>	<b>Notice of Order</b>
<input checked="" type="checkbox"/> Approval <input type="checkbox"/> Conditions of Approval <input type="checkbox"/> Refusal	<input type="checkbox"/> Approval <input type="checkbox"/> Conditions of Approval <input type="checkbox"/> Refusal	<input type="checkbox"/> Notice of Order

**REASONS FOR APPEAL** Sections 678 and 686 of the *Municipal Government Act* require that the written Notice of Appeal must contain specific reasons for the appeal.

The grounds for this appeal are as follows:

SEE ATTACHED DOCUMENTS:

- ATTACHMENT #1

- COPY OF ORIGINAL LETTER OF OPPOSITION TO THE ABOVE NOTED DEVELOPMENT APPLICATION - DEV14368 DATED FEBRUARY 22, 2023

(Attach a separate page if required)

This Personal information is collected under the authority of the Freedom of Information and protection of Privacy Act, Section 33(c) and the Municipal Government Act, Sections 6788 and 685 Note: **This information will form part of a file available to the public**, if you have any questions regarding the collection of this information, contact the FOIP Coordinator at (403) 329-7329.

Signature of Appellant Edward Betts		Karen L. Betts		Date 2023 03 12 4
<b>FOR OFFICE USE ONLY</b>				
Final Date of Appeal YYYY MM DD	Appeal Number	Hearing Date YYYY MM DD	Date Appellant Notified YYYY MM DD	

**ATTACHMENT #1**

City of Lethbridge – **NOTICE OF APPEAL**

**Subdivision & Development Appeal Board**

**Municipal Address of Appeal:** 221 – 2 Avenue South, Lethbridge, Alberta

**Development Application Number:** DEV 14368

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**Name of Appellant:** Edward & Karen Betts

**Mailing Address:** #327 – 100 - 2nd Avenue South, Lethbridge, AB, T1J 0B5

**Residence Phone:** 403-388-4279      **Cell Phone:** 403-393-3486

**Email:** [tkbetts123@gmail.com](mailto:tkbetts123@gmail.com)

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**Reasons for Appeal:**

We, Edward & Karen Betts, do hereby wish to appeal the Approval of Development Permit #DEV 14368 for the following reasons:

- The approval of supportive housing in the Castle Apartments is NOT appropriate or compatible with the residents of the Lethbridge downtown core
- There are at least six (6) Senior Citizen Residences, within a 2-3 block radius of Castle Apartments, housing more than 1200 seniors, age 55 plus, who will be impacted negatively by this development
- Due to the large population of ‘vulnerable persons’, currently wandering the streets of our downtown neighbourhood 24 hours a day, the safety and quality of life of the city residents is at **GREAT RISK!**
- The downtown core of Lethbridge (and other areas as well) is already subjected to a high level of Vagrancy, Pan Handling, Drug & Needle Debris, Public drunkenness and Drug Use, Public Defecation & Urination, by this vulnerable population
- While the “Supportive Housing” being planned for Castle Apartments may seem insignificant in number, at the moment, it will only serve to open the door to the approval of additional housing of this nature, in our downtown core. **The Rezoning of Castle Apartments will only serve to exacerbate the current problem!**
- The reputation, as a whole, of the City of Lethbridge, has already been negatively impacted by these chronic social issues and will only become worse over time

- The *'Quality of Life'* for the Seniors of this area and the rest of the residents of Lethbridge, will continue to be eroded by the additional presence of "Supportive Housing" in the downtown core
- The local business community, as well as the local tourism industry will not survive as long as we continue to allow the essence of our city, especially the downtown core, to be changed forever

Lethbridge is a beautiful City, which boasts of so many local and regional attractions that appeal to local residents and tourists. For example, the Multi-Million Dollar expansion of the **"Exhibition Park, Agri-Food Hub & Trade Centre"** to name just one, currently being built to attract tourism and business investments to the area.

Also, our **"Downtown Revitalization Program"**, in support of our local business merchants, working hard to enhance the downtown core and attract local residents, their families and tourists to visit downtown. The city is asking residents to explore our local downtown shops, attractions and to "buy local".

It likely won't happen if residents and tourists are to be continually confronted with panhandling, public drunkenness, drug use and fears for our personal safety issues. What family would ever want to bring their children downtown to Galt Gardens or to explore the local shops, if the fear of that happening is a reality? What tourist would risk coming downtown, especially after dark, to explore the pubs or a casual meal at a sidewalk café, if they fear being hassled for money, cigarettes, etc?

Lethbridge City Council and relevant Committees need to take serious steps to *'clean up'* our downtown district and make it more attractive and **SAFE** for everyone, before it's too late. **This would prove to be a definite "win-win" for everyone!!**

**We are NOT against "Supportive Housing" and truly support the need for programs and housing for the vulnerable population of our city. However, we do NOT support the location of these projects being in our downtown core any longer.**

We suggest and would support these programs and housing projects to be located in a more appropriate area that would be compatible with the residents of that location. A semi-rural property perhaps, where residents could grow a garden, raise some small

livestock and participate in meaningful programs that would help them to achieve sobriety and lead a more successful lifestyle.

We both have had career experience in the fields of Social Assistance, Criminal Justice and Addiction Services. We have both been part of meaningful programs that helped to 'make a difference' in the lives of vulnerable persons wanting a better existence.

We do not believe that approving "Supportive Housing" in Castle Apartments will serve to provide any improvement in the current social issues facing our city.

**Much more thought and planning (not just funding) needs to be put into these initiatives if we, as a society, are ever going to 'make a difference' in the future of our community.**

**Therefore, we ask that the members of the *Subdivision & Development Appeal Board* RESCIND the approval of Development Permit DEV14368 as given by Ms. Angie Olsen, Manager – Development Department.**

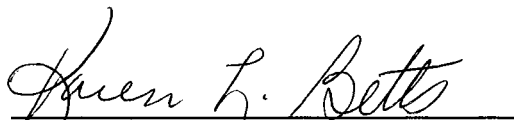
We have also included a copy of our original "Letter of Opposition" to this Development Permit, for your perusal and further consideration.

**Thanking all of you in advance, for your utmost consideration and agreed denial of the aforementioned Development Permit.**

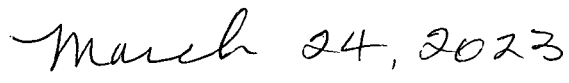
Yours Respectfully,



Edward Betts



Karen Betts



Date Signed

Sent via e-mail: <angie.olsen@lethbridge.ca>

February 22, 2023

**Ms. Angela Olsen,**  
**Manager – Development**  
City of Lethbridge – Planning & Design  
910 – 4 Avenue South  
Lethbridge, AB, T1J 0P6

Dear Ms. Olsen,

**Re: Application for Rezoning**  
**Castle Apartments**  
**221 – 2 Avenue South**  
**Lethbridge, Alberta**

## **OPPOSED**

A recent application has been made by the Lethbridge and Region Community Housing Corporation for the rezoning of the property shown above, located at 221 – 2 Avenue South, for the ***“Discretionary use of Supportive Housing – Restricted”*** within the **Lethbridge Downtown Community Zone**.

How many times is Lethbridge City Council going to allow this to continue?! In the past few years, residents of Lethbridge have been **continually** subjected to the process of various groups petitioning for *“supportive housing programs”* and the like, in all areas of East Lethbridge.

**When will the City begin to listen to the residents when we ask *“what part of NO don’t you understand?”***

**We submit this letter to you as confirmation of our OPPOSITION to this application!**

We are Senior Citizens (*Retired Professionals*) and have been full time Residents and Property Owners in Lethbridge since January 2008.

At that time, we chose Lethbridge as the *“ideal”* community, especially for Retired Seniors, because of the moderate size & population as well as the many professional services and amenities available to the local residents. We were also attracted to the many beautiful parks, recreational facilities and the scenic coulees. Since our arrival, the city has grown exponentially in population and development; making Lethbridge more attractive and enjoyable to us as the years have passed.

In March of 2020, we sold our home in Lakeview and moved into a Condo Unit in River Ridge Condominiums, located on 2 Avenue South, next to the downtown core. We were excited about the benefits of living in a condo and the opportunity to now explore the downtown area on foot, as well as

enjoy the area amenities such as Park Place Mall, Galt Gardens, CASA, a wide variety of reputable restaurants and numerous other local shops and attractions.

**While we have truly enjoyed “condo living” and being ‘downtown’ over the last 3 years, our experiences have been greatly overshadowed by the growing amount of local vagrancy, public begging and harassment, excessive litter, public drug and alcohol use as well as the proliferation of abandoned needles and other drug paraphernalia; not to mention the presence of public urination and defecation EVERYWHERE in our once beautiful downtown district! It is no longer desirable for our local businesses, residents and/or tourists. It is no longer SAFE for most people to enjoy the many beautiful aspects of downtown Lethbridge. Such a shame!**

**Sadly, this problem has not confined itself to our downtown district; it has been allowed to spread to almost every local public park, green space, public pathways, schoolyards, back alleys and storefront sidewalks. It is disgusting to say the least!**

**Given the fact that Lethbridge is now often referred to as “Methbridge” in social media and internet news articles, we often feel shame and embarrassment when asked what city we live in!**

**We have both had experience working in the fields of Social Services, Criminal Justice and Addiction Services.**

Therefore, we feel the approval of this application for the 25 beds of “*Supportive Housing*” by LHA will serve to be completely ineffective and prove to be nothing more than a “*Band-Aid*” approach to the REAL Problem with Homelessness in Lethbridge at this time.

The REAL problem usually originates with Addictions and Mental Health issues with most of the individuals who are currently homeless and living in Lethbridge. Recovery needs to start at the CORE of the problem. Homeless persons require access to (*and the personal desire to access*) extensive and reputable resources and recovery programs to help them achieve sobriety and build self-esteem.

This process does not succeed with a “*quick fix*” of any kind. Simply providing 25 beds in Castle Apartments appears to be just that! The road to recovery is usually a long and very arduous journey; not one that happens overnight!

Based on recent statistics, the majority of our homeless population are of Indigenous Heritage (74%). We believe that Indigenous persons should be afforded a program(s) whereby they are mentored by experienced Elders of their own community; Indigenous persons who can truly understand the issues and are able to counsel and guide them in their cultural quest to find their true inner spirits, achieve sobriety and eventually, live a productive way of life.

Hundreds of thousands of dollars have recently been committed to Indigenous Persons of Canada and their communities, by the Federal Government, under the “*Truth & Reconciliation Commission of Canada*”.

Based on the many generations of Indigenous Persons affected by the acts of Early Colonialism, it would appear to be more effective and beneficial to have Indigenous Communities build functional, successful *"Healing Centres"* in their own local communities. Hopefully, the Indigenous Elders of these communities can then mentor and serve their own peoples with their extensive ancestral knowledge, understanding and skills.

**For the reasons provided above and more, we are firmly opposed to this application!**

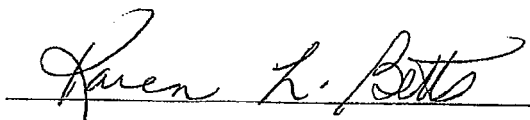
**We sincerely trust that you will appreciate and support the strong opposition provided by the members of our neighbourhood and reject this application completely!**

Thanking you in advance for your kind support and consideration.

Regards,



Edward & Karen Betts  
Unit #327, 100 - 2 Avenue South  
Lethbridge, AB, T1J 0B5



**Copies to:**

- MLA Lethbridge West, Shannon Phillips
- MLA Lethbridge East, Nathan Neudorf
- Mayor Blaine Hyggen & Lethbridge City Council Members
- Robin James, CAO, Lethbridge Housing Authority
- Sarah Amies, Exec. Dir. - Downtown Lethbridge BRZ
- Chief Shahin Mehdizadeh, Lethbridge Police Service
- Board of Directors, River Ridge Condominiums Plan #9710731
- Al Beeber, Lethbridge Herald Newspaper





CITY OF  
*Lethbridge*

NOTICE OF APPEAL  
Subdivision & Development Appeal Board

In accordance with sections 678 and 686 of the Municipal Government Act and The City of Lethbridge Bylaw 4749, an appeal to the Subdivision and Development Board must be filed within the legislated time frame.

<b>Site Information</b>		Date Received (Date)	
Municipal Address of Appeal 221 2 Avenue South Lethbridge <b>221 2 Ave. South</b>			
Legal Description of Site (must be completed for subdivision appeals) 43535 5 12-14 <b>43535. 5. 12-14</b>			
Development Application Number or Subdivision Application Number Dev 14368 <b>Dev 14368</b>			
<b>Appellant Information</b>			
Name <small>Varzari Trading Ltd. McDonald's Restaurants - Lethbridge Arby's Restaurants - Parkside Enterprises Ltd.</small>			
Mailing Address <b>C/O #14 20 Laval Blvd. W.</b>			
City Lethbridge		Province Alberta	Postal Code <b>TIK 4E4</b>
Residence # 403-381-1370	Business # 403-381-1370	Email <b>barry3022@shaw.ca</b>	

APPEAL AGAINST (Check One Box Only) for multiple appeals you must submit another Notice of Appeal

<b>Development Permit</b>	<b>Subdivision Permit</b>	<b>Notice of Order</b>
<input checked="" type="checkbox"/> Approval	<input type="checkbox"/> Approval	<input type="checkbox"/> Notice of Order
<input type="checkbox"/> Conditions of Approval	<input type="checkbox"/> Conditions of Approval	
<input type="checkbox"/> Refusal	<input type="checkbox"/> Refusal	

REASONS FOR APPEAL Sections 678 and 686 of the Municipal Government Act require that the written Notice of Appeal must contain specific reasons for the appeal.

The grounds for this appeal are as follows  
See Attached page 2 and letters from each of the four appellants

**Varzari Trading Ltd.**  
**McDonald's Restaurants, Lethbridge**  
**Arby's Restaurant**  
**Parkside Enterprises Ltd.**

(Attach a separate page if required)

This Personal Information is collected under the authority of the Freedom of Information and Protection of Privacy Act, Section 32(3) and the Municipal Government Act, Sections 6786 and 685. Note: This information will form part of a file available to the public. If you have any questions regarding the collection of this information, contact the FOP Coordinator at (403) 329-7329.

Signature of Appellant <i>[Signature]</i> <b>Ryan Abilmona</b>		Date <b>2023-03-23</b>	
<b>FOR OFFICE USE ONLY</b>			
Final Date of Appeal YYY MM DD	Appeal Number	Hearing Date YYY MM DD	Date Appellant Notified YYY MM DD

Re: Development Application No. Dev. 14368, 221 – 2 Ave. S.

**GROUND FOR APPEAL**

The proposed development:

- 1) Unduly interferes with the amenities of the neighbourhood;
- 2) Materially interferes and affects the use, enjoyment and/or value of the neighbouring parcels of land; and
- 3) Does not conform with the vision and goals of redevelopment for Downtown Lethbridge, specifically but not limited to the Heart of the City Master Plan.

Also, please see attached letters from each of the four appellants:

- A) Varzari Trading Ltd.
- B) McDonald's Restaurants, Lethbridge
- C) Arby's Restaurant
- D) Parkside Enterprises Ltd.

# **VARZARI TRADING LTD.**

Chancery Court #330 220 - 4<sup>th</sup> STREET SOUTH, LETHBRIDGE, ALBERTA Ph: (403) 320-1953 FAX: (403) 329-0805

20 February 2023

CITY OF LETHBRIDGE  
 Attention: Planning & Design  
 Main Floor, City Hall  
 920 - 4<sup>th</sup> Avenue South  
 Lethbridge, AB T1J 0P6

ATTENTION: Angela Olsen, Manager - Development

Re: Opposition to the Development Application for Supportive Housing  
 Castle Apartments, 221 - 2<sup>nd</sup> Avenue South, Lethbridge, AB

**This letter will serve as written confirmation that I strongly oppose the Development Application for Supportive Housing, Castle Apartments, 221 - 2<sup>nd</sup> Avenue South, Lethbridge, Alberta, to allow for the use of the existing buildings as a supportive Housing.**

## **My Background**

I have lived in Lethbridge my entire life and have built a successful international Steel Services Company, with branches across Western Canada and the USA, utilizing Lethbridge as my base of operations.

I own multiple commercial properties in downtown Lethbridge which include:

1. **Chancery Court - 220 - 4<sup>th</sup> Street South**  
 This building includes multiple long-term tenants with highly successful law practices, engineering practices and other valuable services.
2. **Commerce Court - 220 - 3<sup>rd</sup> Avenue South**  
 This building also includes long-term tenants with successful and highly valued businesses in our community including, but not limited to, a popular radio station in our City.
3. **Varzari Storage - 209 - 4<sup>th</sup> Street South**  
 This building includes many long-term tenants with whom we have worked for years and with whom we have developed successful business relationships.
4. **Parking Lot, located at 402 - 3<sup>rd</sup> Avenue South**
5. **Parking Lot, located at 401 - 2<sup>nd</sup> Avenue South**
6. **Parking Lot, located at 302 - 2<sup>nd</sup> Avenue South**
7. **Parking Lot, located at 306 - 2<sup>nd</sup> Avenue South**
8. **Parking Lot, located at 404 - 3<sup>rd</sup> Avenue South**

I love this City and I have chosen to keep my base of operations in this Community. I value my family, friends and business associates, who, like me, have worked hard to build their lives here. I have no intentions of selling any of the aforementioned properties, the objective being that they will eventually be taken over by my family, who are also long-term residents of Lethbridge.

I invested in the downtown properties believing them to be good investments in thriving areas of the City. As a commercial industrial property owner in Lethbridge, it allows me the ability to provide a valuable space for others to conduct their business.

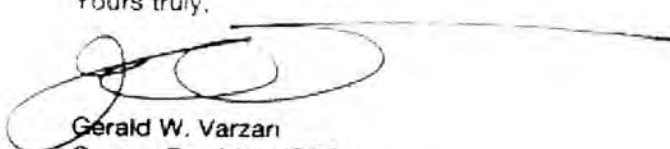
Over the last number of years, the City of Lethbridge and many downtown stakeholders, have invested a great amount of time, effort and resources in revitalizing the downtown core. The approval of the application for supportive housing at Castle Apartments, 221 - 2<sup>nd</sup> Avenue South in Lethbridge, would be a significant setback and a detriment to the progress that has been made by the City in their revitalization efforts.

Inasmuch as I understand the need and the vital importance in the Community for supportive housing, I strongly encourage the City of Lethbridge, Planning & Design Department to find a more appropriate location. A location that will not negatively affect the livelihoods, culture and safety of those who live, work and conduct business in our downtown core.

I AM STRONGLY OPPOSED TO THIS DEVELOPMENT APPLICATION FOR SUPPORTIVE HOUSING, and I would urge the Manager of Development at the City of Lethbridge, Planning & Design Department, to disapprove this application. I know many other downtown business owners, homeowners and residents who live in the downtown core, share my opinions.

Thank you for your continued service and support of our flourishing communities and this beautiful City we all call "Home".

Yours truly,



Gerald W. Varzari  
Owner, President/CEO  
Varsteel Ltd. / Varzari Trading Ltd.



McDonald's Pincher Creek & Lethbridge 6704719  
Canada Inc. 217 3rd Av., Lethbridge, AB, T1K 6W7

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Re: Opposition to Application for Supportive Housing at Castle apartments, 221-2nd Ave. S.

City of Lethbridge  
Planning and Design  
Angela Olsen  
Manager-Development  
[PlanningandDesign@lethbridge.ca](mailto:PlanningandDesign@lethbridge.ca)

I am the owner and taxpayer of the 7 McDonald's restaurants here in Lethbridge. I am writing this letter specifically regarding our Downtown location at 217 3rd Ave South. To our understanding Castel Apartments are considered for supportive housing, to which I am strongly opposed.

In the past we have encountered multiple incidences of assaults on our staff, employee being stung by a syringe when changing garbage, vandalism, massive drug use in the toilets, overdoses, blood and feces on the walls and floor of our bathrooms, and unfortunately fatalities. All in our Downtown restaurant. This location also happens to be our head office and where we orientate our newly hired staff. For more than 400 employees, we currently employ, this is their first impression of work, as many come for a first employment and, for some, visit for the first time Downtown Lethbridge from different part of our great city. The proposal for supportive housing would be only a few meters from the entrance of our parking. The impact on guest and employee safety would be insurmountable. We have a very large play-place, you can imagine your 5 years old child or grandchild going to the washroom during a birthday party and be facing one of the situations I described. My washrooms are still open, many other business and municipal facilities closed and locked their washrooms.

I value what Downtown Lethbridge with the BRZ is doing with the revitalization efforts, and we see the amazing changes and updates the city is doing. I understand that this is coming at a great cost to the city and many other business owners like me. Just last year we invested more than \$1 million to redesign our Downtown restaurant to stay current, safer and attract more families Downtown. Supportive housing will go against all that investment and push families further away from shopping and visiting the city core.

I am in support of finding solutions to what is a problem with creating accessible housing and supportive option for the people of Lethbridge, however, Downtown is not the place for this.

I sincerely hope you take my letter seriously, as well as the opinions of the neighboring businesses and residents, and find a different solution for housing. Allowing this would collapse any business's effort to operate around Downtown.

Sincerely  
Pierre Nuyt

**From:** [Janine Small](#)  
**To:** [Angie Olsen](#)  
**Subject:** FW: [External] Castle Apartments- Supportive Housing Application - Letter of Opposition  
**Date:** Wednesday, February 22, 2023 10:39:51 AM

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This was in the 3920 mailbox.

Thank you.



**Janine Small**

Permit Technician | Planning & Design | City of Lethbridge

P: 403-320-3197

E: [janine.small@lethbridge.ca](mailto:janine.small@lethbridge.ca)

A: Main Floor, City Hall 910-4<sup>th</sup> Avenue South, Lethbridge, AB, T1J 0P6

[website](#) | [eApply](#) | [MyCity](#) | [Online Payments](#)

**From:** Ryan Abulmona <[ryan.abulmona@gmail.com](mailto:ryan.abulmona@gmail.com)>  
**Sent:** Tuesday, February 21, 2023 8:01 PM  
**To:** City of Lethbridge - Planning & Design <[planninganddesign@lethbridge.ca](mailto:planninganddesign@lethbridge.ca)>  
**Subject:** [External] Castle Apartments- Supportive Housing Application - Letter of Opposition

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Angela and the City Planning department,

I am writing this email to express my strong opposition to the supportive housing application for the Castle Apartments which, if passed, will greatly compromise the operation of our restaurant (Arby's Restaurant) which is right next door to the current castle apartments.

As a business owner with a restaurant right next door, and another business (Escape From LA) not far away, I am extremely concerned about this potential application and the negative impact it could have on my businesses. The possibility of this new development would be highly distressing to our customers and its implementation would incur a significant cost to our business and to the general downtown community. We have been a part of the downtown community for over 30 years. This restaurant is my family's main source of income and approving the proposed application will jeopardize everything that we have put our entire lives into building up. This restaurant is the future for me and my family and we have dedicated our life to it. We invested everything into purchasing this land and building and reinvested even more just a few years ago with a full scale renovation. Approving this application would put all of that at risk. In addition to losing customers we will also be putting our employees at risk. Our employees already do not feel safe at work with the current traffic that is always in and around the restaurant coming from the castle apartments. Approving this supportive housing application will only lead to an increase in incidents at our restaurant and involving our employees who are not trained and should not need to be trained to deal with such situations.

I urge you to disapprove of the proposed supportive housing application, and from talking to my fellow business owners in the area, I know my opinions are shared by many who have not written letters and emails.

Sincerely,

Ryan Abilmona  
Arby's Restaurant and Escape From LA

**From: Parkside Enterprises Ltd., Barry Marquardson**

**To: Angela Olsen, Manager – Development  
City of Lethbridge, Planning and Design Department**

**I am writing in opposition to Castle Apartments at 221 – 2<sup>nd</sup> Ave. S., to allow the use Supportive Housing.**

**My Background:**

I have owned the 1.6-acre parcel of land one-half block west of the Castle Apartments, for over 35 years. My tenants are Wendy's Restaurant and Shell Canada/Circle K. I also own a vacant parcel of land behind Shell for future development. I have a long-term perspective, and I plan to own this property for the rest of my life. My family has lived in or near Lethbridge for over 120 years. I was born in Lethbridge and have lived here all of my life.

**1) It is my understanding that the intended Supportive Housing occupants for the Castle Apartments will include the homeless, and those with drug and alcohol addictions, and mental health issues.**

I understand that this may be a wet facility and the residents may consume legal drugs and alcohol in their rooms. If the residents want to consume illegal drugs, they will have to do so outside the Supportive Housing.

It is reasonable to assume that the building culture and subsequently that of the area will become more of a drug and alcohol culture and that this culture and its negative impacts will spread into, and become part of the immediate and surrounding business and residential area.

Therefore, given an addiction culture, and to fund and support these addictions, I believe it is reasonable to expect an increase in criminal activity in the immediate area including: violent crime, car break-ins, home/business break-ins, intoxication/high on drugs in public, needle debris, drug dealing, prostitution, urination and defecation in public, public sex and panhandling.

**2) Area business owners, property owners and home owners have invested in the immediate area based upon the use as apartments.**

We have all made significant investment and business decisions assuming that Castle would continue to operate as apartments NOT supportive housing.

This commitment and investment was based upon the integrity of the City of Lethbridge's commitment to complimentary land uses.

I believe that the proposed land use is not appropriate, and in fact, is extremely harmful to the business owners, property owners and home owners in the area. It would be unfair to change the rules now.

There was a certain expectation as to the safety of the neighborhood, quality of life and protection of property values.

For the above stated reasons, the Castle Apartments location is not appropriate for the proposed use.



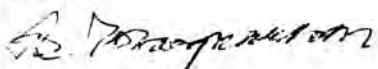
Please help to protect our safety, our quality of life, and our property values.

**I respectfully request that the City oppose Supportive Housing at Castle Apartments.**

Thank you for your consideration.

Sincerely,

Barry



Barry Marquardson  
Parkside Enterprises Ltd.

Ph: 403-381-1370

Email: [barry\\_3022@shaw.ca](mailto:barry_3022@shaw.ca)

Address: **221 2 AVE S**  
Legal: 4353S;5;12-14

District: C-D

Applicant: LETHBRIDGE & REGION COMMUNITY HOUSING CORPORATION  
Address: 314 3 ST S LETHBRIDGE AB T1J 1Y9

Phone: (403) 329-0556

**Development Proposed** A request for a change of use for a portion of the building to allow supportive housing for a maximum of 25 residents. These on-site support includes daytime social support, referrals and additional services in order to maintain safe, secure, and stable housing, as well as overnight security to ensure the safety of all residing within the building. The residents will continue to be low to medium acuity.

The rest of the building will remain as Dwelling, Apartment and the tenants that reside in these units will not be receiving any supports.

**District** C-D DOWNTOWN COMMERCIAL

**Land Use** DWELLING, APARTMENT - DISCRETIONARY  
SUPPORTIVE HOUSING - DISCRETIONARY

#### **CONDITIONS OF APPROVAL**

**1. Land Use:**

"Supportive Housing" which is a discretionary use in the C-D district and is limited to a maximum of 25 residents at any one time.

"Dwelling, Apartment" which is a discretionary use in the C-D district.

**2. Compliance with the plans:**

The development shall be in accordance with the plans submitted February 1, 2023. Any change to these plans requires the approval of the Development Officer.

**3. Off-street Parking:**

No additional parking spaces are required for this use, any existing spaces shall be provided and maintained.

**4. Signs:**

Prior to the installation of any exterior signs, a sign permit must be approved by the Development Officer.

**5. Neighbourhood Communication Plan:**

The Neighbourhood Communication Plan, submitted February 7, 2023, must be adhered to by the owner/operator of the supportive housing facility. When the Neighbourhood Communication Plan is updated in the future, copies must be provided to the landowners within a 60m radius, the Downtown BRZ and the City of Lethbridge Planning and Design department.

**Decision Date**

Mar 01, 2023

**Valid Date**

Mar 28, 2023

**Development Commencement**

Provided this decision is not appealed, development shall commence:

- on or after the valid date, and
- within one year of the valid date.

Development may commence before the valid date only if the applicant has signed the "Voluntary Waiver of Claims" and is in receipt of this signed permit.

**Development.**  
**Authority**

  
ANGELA OLSEN, DEVELOPMENT OFFICER

**STATUTORY PLANS**

The SSRP and applicable municipal statutory plans were considered in rendering this decision.

**COMPLIANCE WITH OTHER LAWS AND AGREEMENTS**

The City of Lethbridge assesses applications according to the development requirements and standards of the Land Use Bylaw in force at the time of application. This Development Permit does not relieve the owner, the applicant, or the owner's authorized agent from full compliance with (i) the terms and conditions of any easement, covenant, building scheme or other agreement affecting the property, or (ii) the requirements of any other applicable laws and regulations.

**APPEALS**

The applicant has the right to appeal this decision to the Subdivision and Development Appeal Board. An appeal shall contain a statement of the grounds of appeal and shall be delivered either personally or by Registered Mail so as to reach the Secretary of the Subdivision and Development Appeal Board not later than twenty-one (21) days after the decision date indicated on the Development Permit or 'Development Permit Application - Refused' letter.

Permits which were the subject of a license, permit, approval or other authorization granted by the Natural Resources Conservation Board, Energy Resources Conservation Board, Alberta Energy Regulator, Alberta Energy and Utilities Board, Alberta Utilities Commission, or by the Minister of Environment and Parks must be appealed through the Land and Property Rights Tribunal.

**FOIP**

The personal information provided as part of this permit is collected under the Alberta Municipal Government Act and in accordance with section 33(c) of the Freedom of Information and Protection of Privacy Act. The information is required and will be used for issuing permits, Land Use By-law 6300 compliance verification and monitoring, and property assessment purposes. The name of the permit holder and the nature of the permit is available to the public upon request and may be revealed in public appeal processes.

If you have questions about the collection or use of the personal information provided, please contact Information Management at 910 4 Ave S Lethbridge, AB, T1J 0P6 or phone at (403) 329-7329, or email [planninganddesign@lethbridge.ca](mailto:planninganddesign@lethbridge.ca).

Permit No. DEV14368

# Development Permit Application

## Multi-Family, Commercial, Industrial, and Public Use Developments

All of the following information is necessary to facilitate a thorough and timely evaluation and decision of your application. All materials submitted must be clear, legible and precise. Only applications that are complete will be accepted. **PLEASE NOTE: this application is ONLY for a development permit. If a building permit is also required, you must apply for it separately.**

**Project Address**  
215 2nd Avenue South & 221 2nd Avenue South

**Access Code**

**Applicant**  
Name Robin James  
Address 314 3rd Street South  
City Lethbridge Postal Code T1J1Y9  
Phone 403-329-0556  
E-mail robin.j@lethbridgehousing.ca  
Signature [Signature]

**Property Owner**  
Name Lethbridge & Region Community Housing Corporation & Canadian Mental Health Association  
Address 314 3rd Street South  
City Lethbridge Postal Code T1J1Y9  
Phone 403-329-0556 B/L # Attached  
E-mail robin.j@lethbridgehousing.ca  
Signature [Signature]

Providing an email means you consent to receiving documents or communications related to this application, including but not limited to development permit decisions, acknowledgments confirming an application is complete, and any notices identifying any outstanding documents and information, by email.

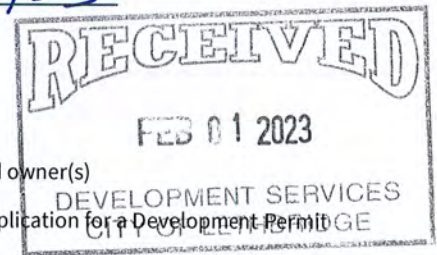
Have you reviewed all registrations on title pertaining to the property?  Yes

I acknowledge and agree that this application does not relieve the owner, the applicant, or the owner's authorized agent from full compliance with (i) the terms and conditions of any easement, covenant, building scheme or other agreement affecting the property, or (ii) the requirements of any applicable laws and regulations.

Signature [Signature] Date 1/31/23

**As the applicant I affirm:**

- I am the registered owner of the above noted property
- I have entered into a binding agreement to purchase the above noted property with the registered owner(s)
- I have permission of the registered owner(s) of the above noted property to make the attached application for a Development Permit



**Description of Work: (Check all applicable)**

- New Commercial, Industrial, or Public Use
- New Multi-Residential Building
- Site & Civil Amendments
- Compliance Waiver
- Addition to Existing
- Exterior Alteration
- Landscaping
- Change of Use
- WECS
- Solar Energy System

**Detailed Description of Work:**

To provide on-site support to up to 25 residents of the Castle Apartments. This on-site support includes daytime social support, referrals and additional services in order to maintain safe, secure, and stable housing, as well as overnight security to ensure the safety of all residing within the building. The residents will continue to be low to medium complexity.

Please accept the request to change the Discretionary Use to include Supportive Housing up to 25 residents.

# Development Permit Application

Multi-Family, Commercial, Industrial, and Public Use Developments

**All Buildings, Alterations, and/or Additions to Existing Buildings**

Occupant / Use 78 Apartments # of off-street parking stalls 26 Total Site Area (M<sup>2</sup>) ~3600

Total Gross Floor Area (m<sup>2</sup>) including all floors and mezzanine for each separate use

Use 1 ~745 Use 2 N/A Use 3 N/A Use 4 N/A Use 5 N/A

Total Net Floor Area (m<sup>2</sup>) for C-D (Downtown Commercial), DT-1 (Downtown 1), and DT-2 (Downtown 2)

Use 1 ~745 Use 2 N/A Use 3 N/A Use 4 N/A Use 5 N/A

**Alterations / Additions to Commercial / Industrial / Public Buildings**

Existing Floor Area (m<sup>2</sup>) N/A # of off-street parking stalls N/A Proposed New Floor Area (m<sup>2</sup>) N/A

**Multi-Unit Residential Development**

# of studio / bachelor units N/A # of 1 bedroom units N/A # of 2 bedroom units N/A

# of ≥3 bedroom units N/A Total # of dwelling units proposed N/A # of off-street parking stalls N/A

**Change of Use within a specific building**

Previous tenant / occupant  
 Occupancy will not change but we are adding the ability to provide support to individuals residing within the building and new tenants as they are approved

Total area of space occupied by this use (m<sup>2</sup>) ~745 Number of off-street parking stalls provided 26

Will you be sharing this space with another tenant  
 Tenants will have their own private living space

Adjacent tenant(s)  
 Are not required to access this support

Will you be doing any construction or modification of the space (e.g. adding a mezzanine, second story, adding or removing walls, washrooms, etc)?  
 If so, explain (other permits may be required)  
No

Will there be any combustible, flammable or explosive materials stored, used or produced at this business?  
No

Will the business activities or uses occurring at this location produce any dust, liquids or gases? For example, manufacturing, furniture refinishing, vehicle repairs, welding, cooking or food preparation?  
No

**Office Use Only**

Permit Required  Yes  No Overlay \_\_\_\_\_

Zoning C-D Development Permit # DEV14368

Allowable Use  Permitted  Discretionary Building Permit # \_\_\_\_\_

**Development Fees to be charged**

Permit Fee 346.00

Advertising Fee 100.00

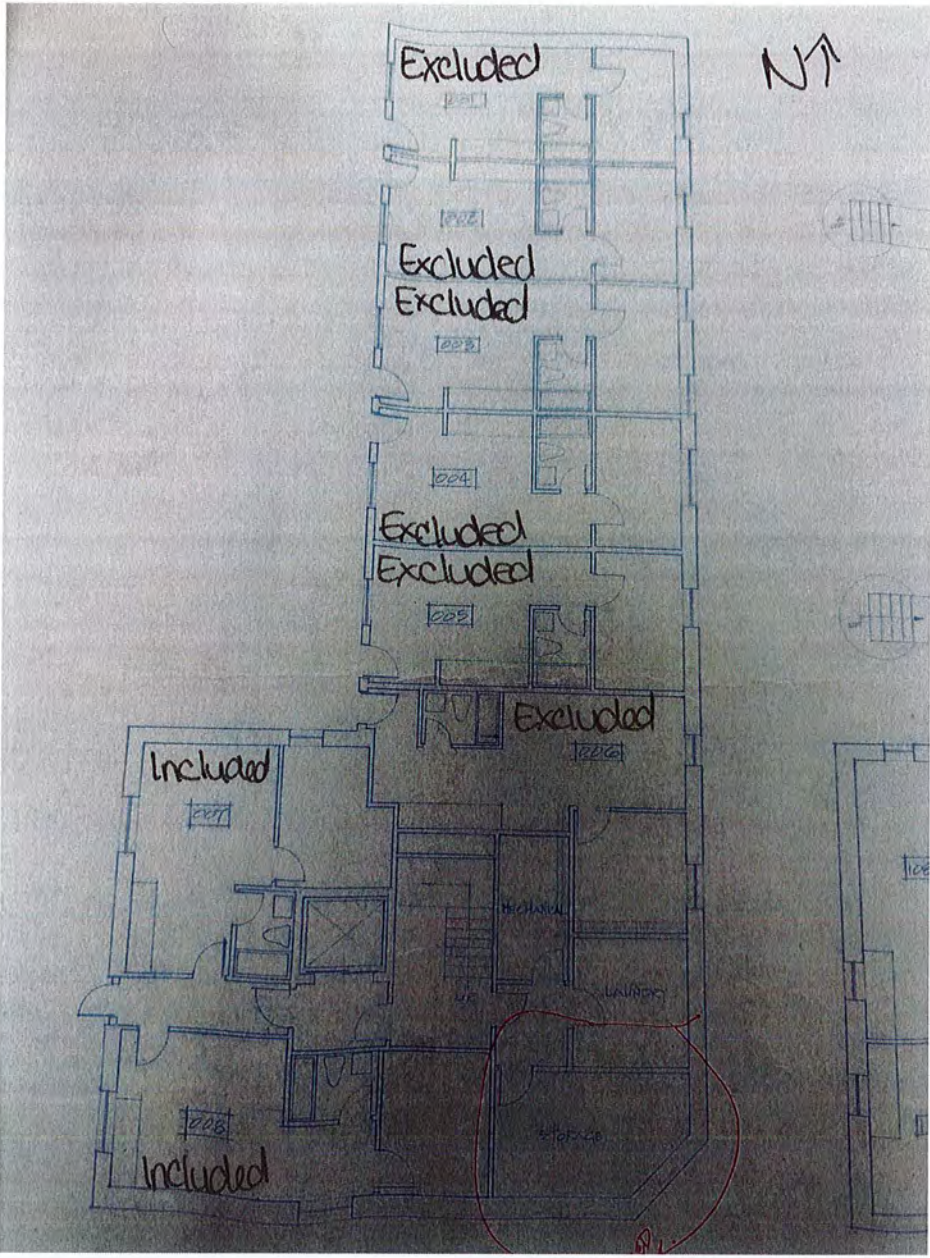
Total 446.00

Any personal information collected on this form is collected under the Municipal Government Act and in accordance with the Freedom of Information and Protection of Privacy Act. The information is required and will be used for issuing permits and planning & development purposes. Please Note that such information may be made public. If you have any questions about the collection, use, or disclosure of the personal information provided, please contact Information Management at 910 4 Ave S, Lethbridge, AB, T1J 0P6 or by phone at 403-329-7329

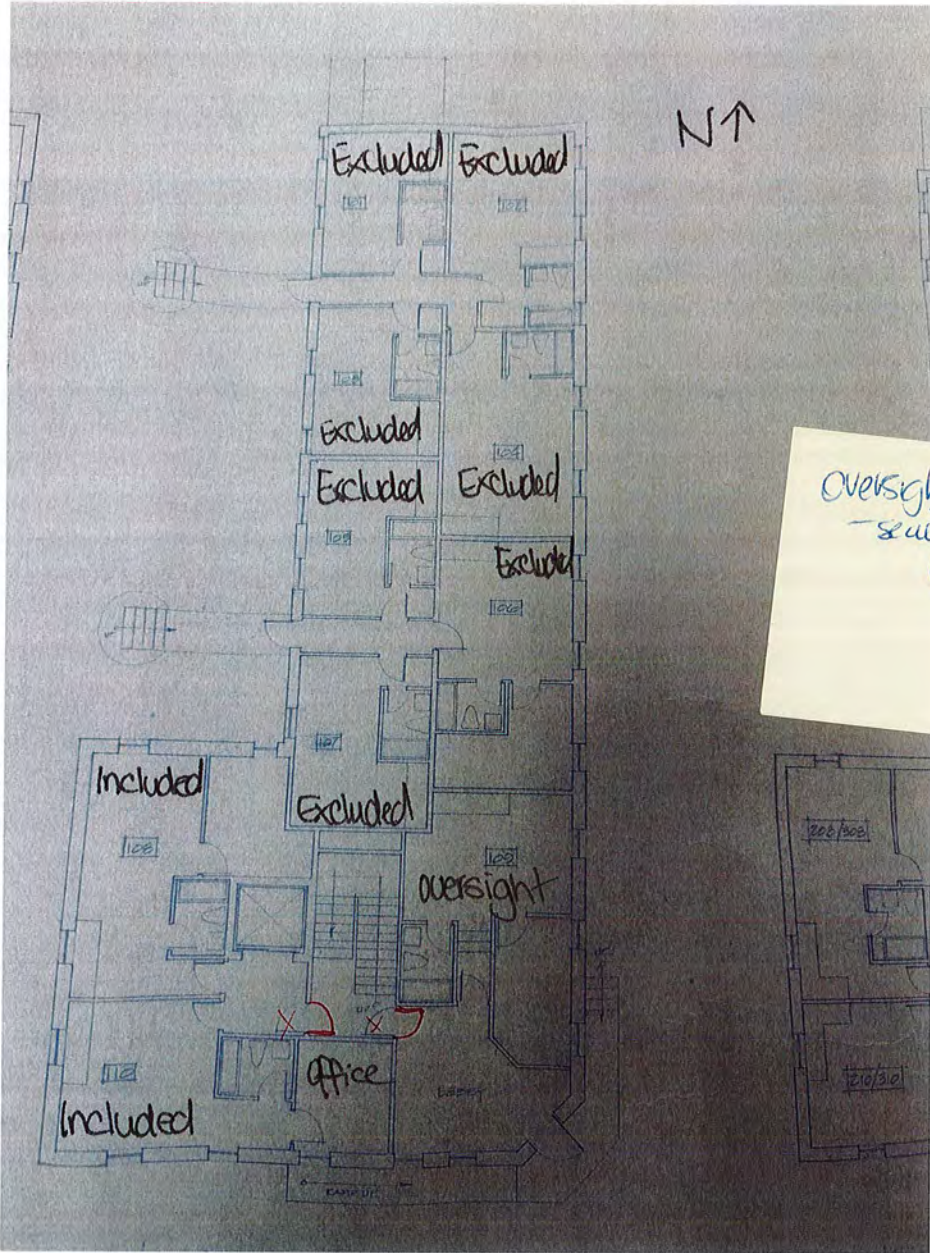
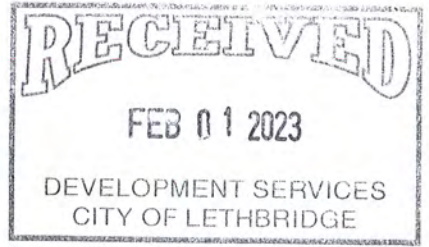
**RECEIVED**

FEB 01 2023

DEVELOPMENT SERVICES  
CITY OF LETHBRIDGE



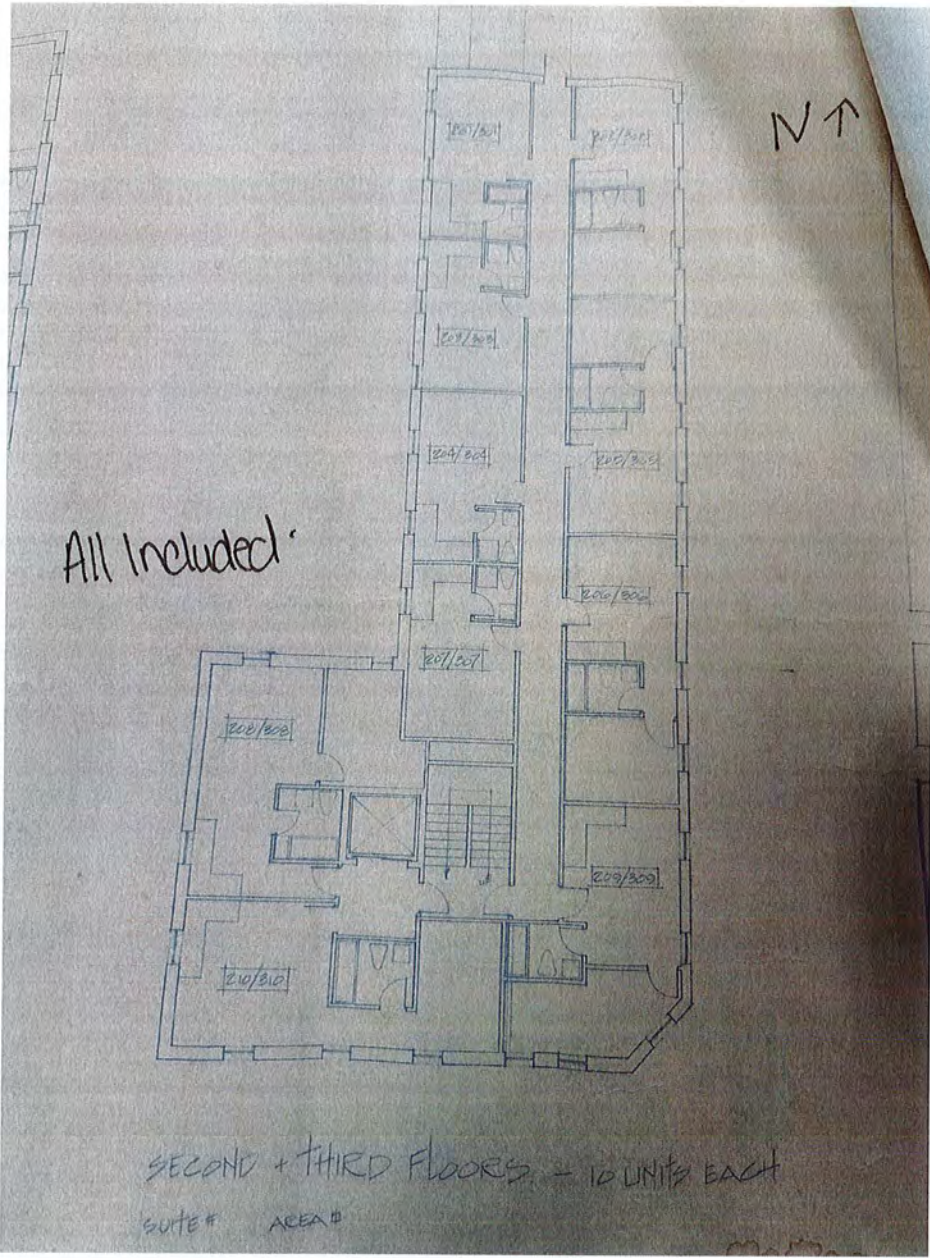
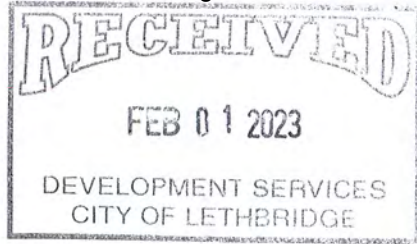
Basement



Main Floor

DEV 14-368

215 2AVE  
201 2AVE



N ↑



Unit #	Access	Concierge Y/N
001	Not Locked	No
002	Not Locked	No
003	Not Locked	No
004	Not Locked	No
005	Not Locked	No
006	Not Locked	No
007	Locked	Yes
008	Locked	Yes
009	Locked	Yes
101	Not Locked	No
102	Not Locked	No
103	Not Locked	No
104	Not Locked	No
105	Not Locked	No
106	Not Locked	No
107	Not Locked	No
108	Staff Suite	No
109	Office	No
110	Locked	Yes
111	Locked	Yes
201	Locked	Yes
202	Locked	Yes
203	Locked	Yes
204	Locked	Yes
206	Locked	Yes
206	Locked	Yes
207	Locked	Yes
208	Locked	Yes
209	Locked	Yes
210	Locked	Yes
301	Locked	Yes
302	Locked	Yes
303	Locked	Yes
304	Locked	Yes
305	Locked	Yes
306	Locked	Yes
307	Locked	Yes
308	Locked	Yes
309	Locked	Yes
310	Locked	Yes

## *Neighbourhood Communication Plan*

Lethbridge & Region Community Housing Corporation

Castle Apartments – 221 2<sup>nd</sup> Avenue South

Lethbridge & Region Community Housing Corporation (L&RCHC) is a charity and non-profit that began in 2008 and is part of Lethbridge Housing Authority (LHA). L&RCHC was created in order to provide more safe, secure, and affordable housing in and around Lethbridge. Castle Apartments is a 78-unit affordable housing property that is co-owned by L&RCHC and Canadian Mental Health Association (CMHA) for the purpose of renting affordable housing to low-income individuals who may require light touch support in order to remain stable in housing. Onsite staff provide essential services and long-term housing stability to individuals who are of low to medium complexity residing within the building. The building located at 215 2<sup>nd</sup> Avenue South includes 39 1-bedroom rental suites and the building located at 221 2<sup>nd</sup> Avenue South includes 39 rental suites, a combination of studio and 1-bedroom apartments. **Specific for this communication plan, L&RCHC is seeking development approval to provide support services to a portion of the building located at 221 -2 Ave S.** The property has 24/7 support, including daytime support provided by Community Support Workers and overnight support provided by Security Personnel. Property maintenance is provided onsite by LHA / L&RCHC Maintenance Staff between the hours of 8:00AM and 4:00PM with emergency after hours maintenance support available as needed. The building also has a live in caretaker that provides after hours oversight of the entire complex.

L&RCHC is committed to ongoing neighborhood relations and communication. One of the ways we ensure this is by tracking all neighborhood complaints and implementing policies and programs to address valid ongoing and repetitive concerns. The Neighborhood Communication Log will be updated each time a community member calls and will be reviewed by L&RCHC Program Directors on at least a monthly basis and reported on to the CAO. Any changes to this plan or contact information will be provided to the neighbouring home and/or business owners, Downtown BRZ and the City of Lethbridge Planning and Design department once confirmed.

The procedure below outlines the process that community members may take when there is a grievance of any type and ensures that these are heard and addressed in a timely manner. Please refer to the City of Lethbridge Public Places Bylaw #6280 for any definitions referenced in this plan as they relate to that bylaw.

L&RCHC is invested in the neighborhood where the Castle Apartments are located. This means that L&RCHC is committed to supporting a healthy and safe community. Supporting this effort is a strong understanding of the roles and responsibilities within the community.

**L&RCHC:**

- Well maintained building, both inside and outside
- Strong guest management policies and procedures
- Creating and supporting tenant investment of those residing within the Castle Apartments
- Sharing open and honest two-way communication
- Offering public service for the benefit of the neighbourhood and community
- Ensure an L&RCHC contact is available 24 hours a day 7 days a week by calling 403-329-0556
- Promptly investigate all concerns regarding client behaviour expressed by neighbours or community members.

**Castle Apartment Concierge Tenants:**

- Commitment to respectful neighborhood interaction
- Up to a maximum of 25 tenants who are part of the Concierge Program will participate in the good neighbor activities and initiatives which include maintaining a peaceful, safe, and clean neighbourhood and community, engaging in respectful interactions within the community, and refraining from engaging in illegal activities or nuisance behaviour, and pan handling within the immediate neighbourhood and community. Good neighbor activities will be an added schedule to the tenants lease and will be review with the tenant at each lease review. \* lease reviews are done quarterly, semi-annually or annually depending on length of tenancies.

**Community:**

- Offering feedback to L&RCHC on Castle Apartments strengths, opportunities for improvement, and concerns
- Reporting of illegal activity to Lethbridge Police Department and L&RCHC
- Reporting of by-law infraction to City of Lethbridge and L&RCHC, including any offense listed in the City of Lethbridge Public Places Bylaw #6280.
- Reporting of nuisance behaviour to L&RCHC.

**Filing a Complaint:**

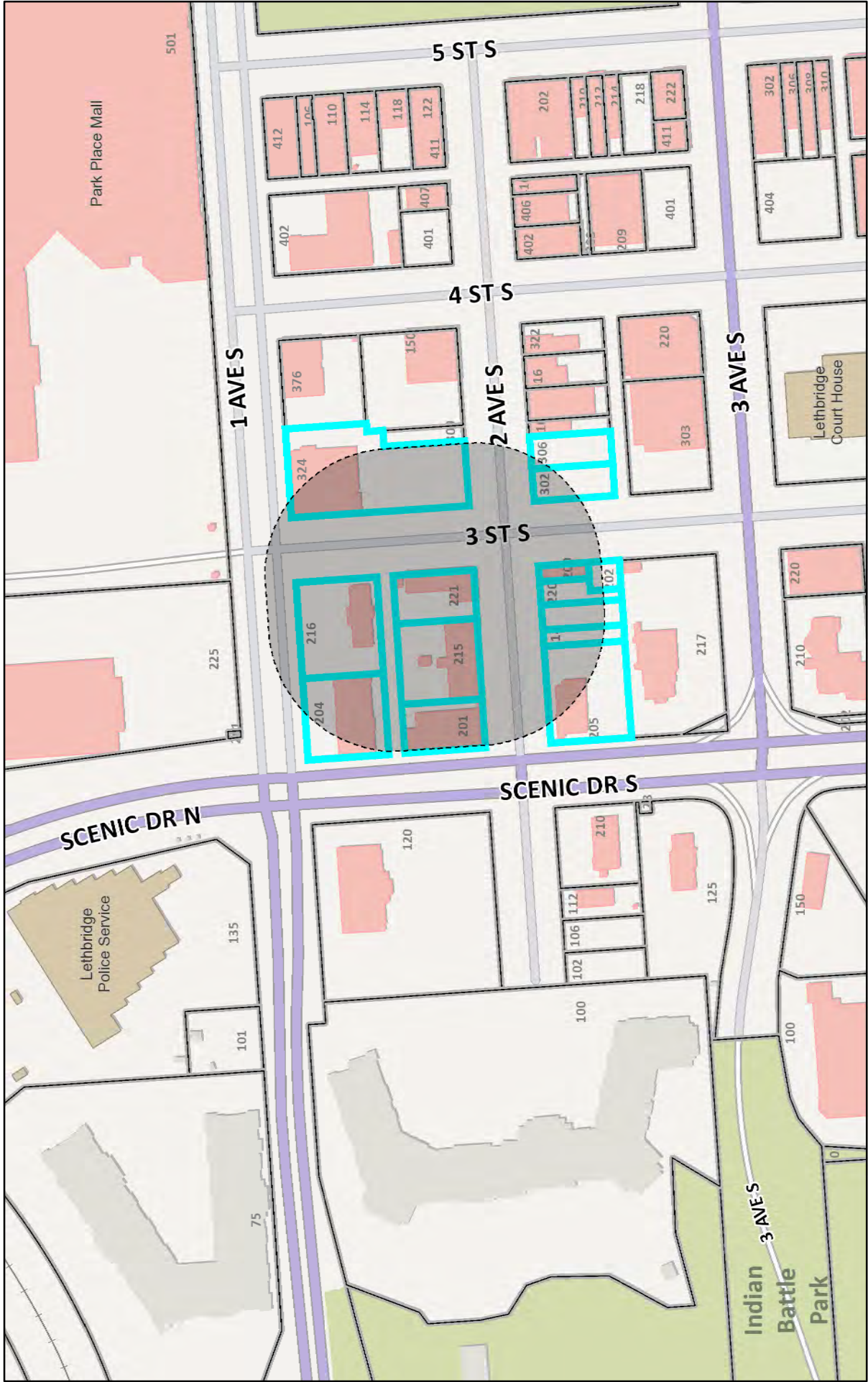
Our community partners and community members have the right to have their complaints heard by the management of Castle Apartments. If you would like to file a formal complaint, please contact Kayla Podrasky through either email [kayla.p@lethbridgehousing.ca](mailto:kayla.p@lethbridgehousing.ca) or call 403-329-0724 ext 144.

Our response upon receiving a community complaint:

1. Whoever receives the complaint will pass the complaint directly to the Program Director Kayla Podrasky who will then inform the CAO or their designate.

2. If the complaint has not been written out, the Program Director will request the complaint in writing, and then forward the complaint to the CAO or their designate. The complaint will need to include:
  - a. Your information – name, address, and phone number.
  - b. When did the event take place?
  - c. Who was involved?
  - d. What took place and what is the nature of the complaint?
  - e. If you have a recommendation of how you would like us to address the situation, please also indicate this information.
3. Upon receipt of the complaint, the Program Director with the CAO, or their designate will:
  - a. Review the grievance.
  - b. Investigate within 2 business days of the complaints, and
  - c. Respond in writing within 10 business days on actions taken to resolve the complaint.
4. If the response received is not satisfactory, the complainant may request their grievance be forwarded to the Board of Directors for further resolution. This can be done by emailing the [LHABoardOfDirectors@shaw.ca](mailto:LHABoardOfDirectors@shaw.ca) The Board of Directors meets monthly on the 3<sup>rd</sup> Wednesday of each month excluding July and August.

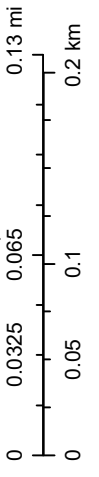
# Parcel Locator WebMAP



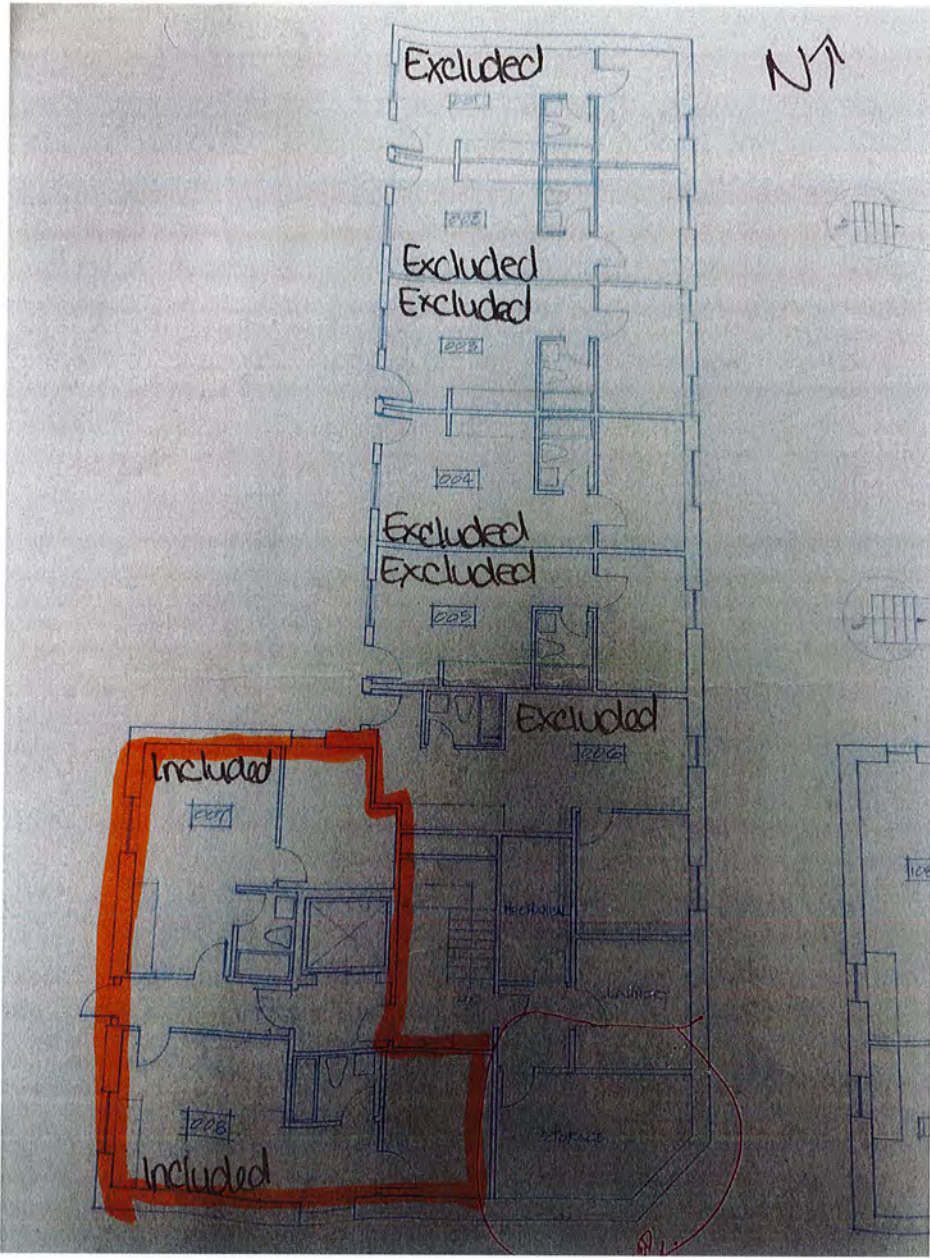
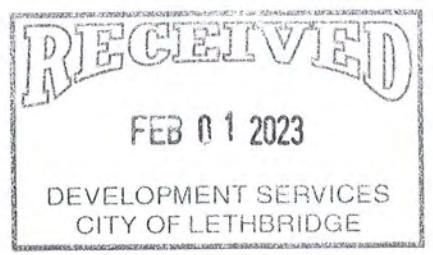
March 29, 2023

□ Parcels

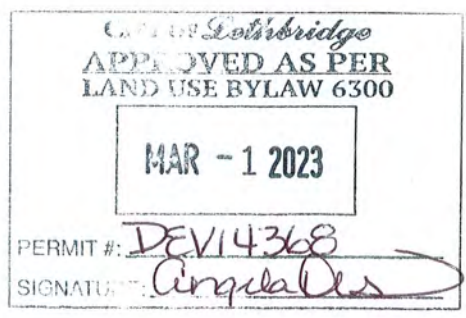
1:3,950



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, Geobase, IGN, Kadaster NL, Ordnance Survey, Esri

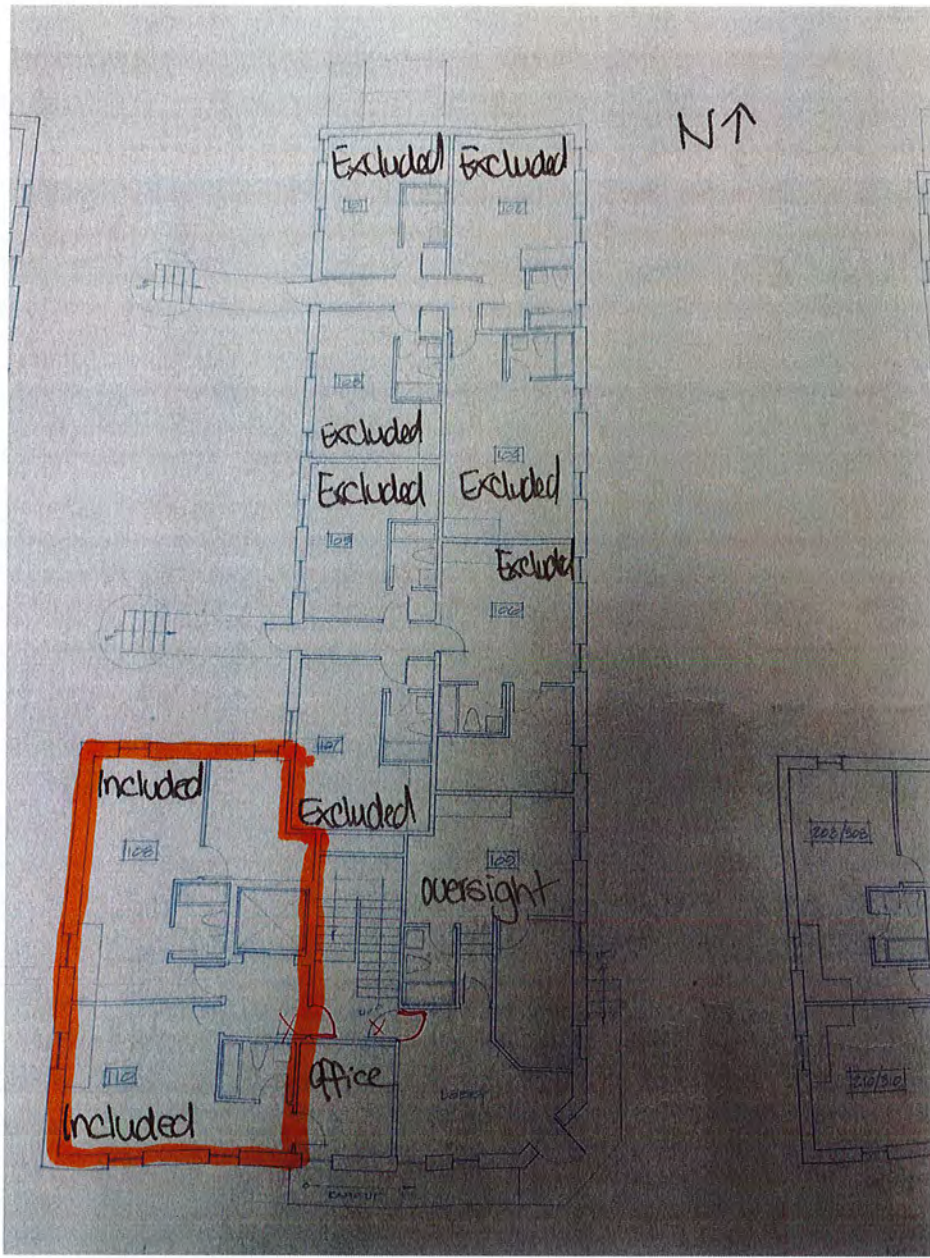
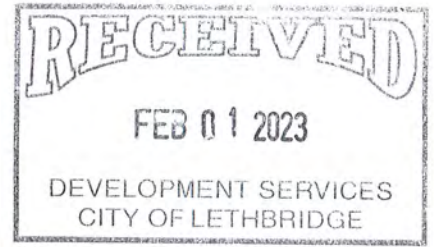


Basement



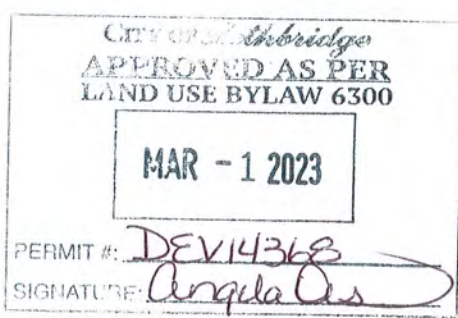
8 units total

2 - Supportive Housing  
6 - Dwelling, Apartment



Main Floor

Oversight is Security + supervisor



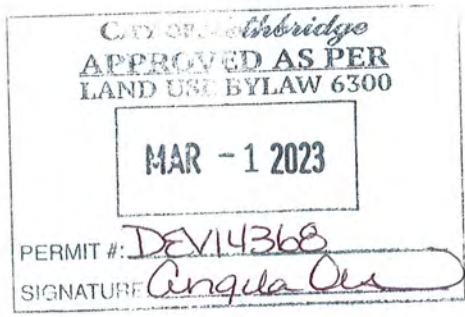
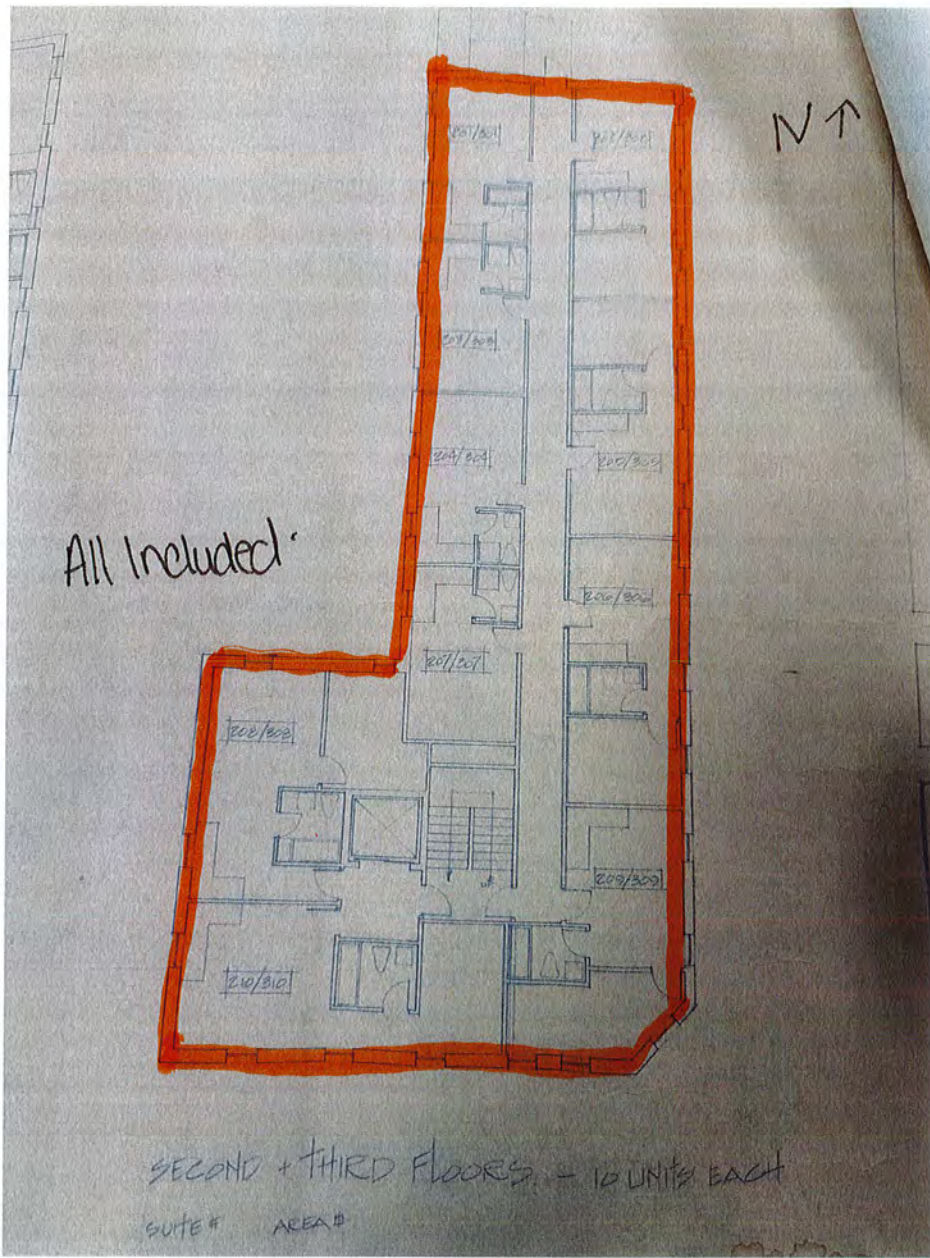
9 units total

2 - Supportive

7 - Dwelling Apart.

DEV 14368

215 Ave  
201 Ave



gnd + 3rd Floors  
10 x 2 = 20 total

20 - Supportive Housing





# Subdivision & Development Appeal Board

SDAB Meeting April 27, 2023



**APPLICATION NO.****DEV14368****LOCATION****221 – 2 Avenue South****LAND USE DISTRICT**

C-D Downtown Commercial District

**APPELLANTS**

Edward & Karen Betts  
 Varzari Trading Ltd  
 McDonald's Restaurants, Lethbridge  
 Arby's Restaurant  
 Parkside Enterprises Ltd.

**LANDOWNERS**

Lethbridge & Region Community Housing  
 Corporation & The Canadian Mental Health  
 Association Alberta South Region, 1990

**CURRENT DEVELOPMENT**

The last development approval for 221 2 Avenue South (87-771) states that it is approved for an 'apartment-hotel' which is interpreted as a discretionary use. This approval did not impose any limitation on the number of suites, provided that the gross floor area of the building is not increased.

**PROPOSED DEVELOPMENT**

An application was made for a change of use to allow 'Supportive Housing' in 25, single occupancy suites. 'Supportive Housing' is a discretionary use in the C-D district. There are a total of 39 units in the building however, only 25 of the residents may receive any supports.

**ADJACENT DEVELOPMENT**

<b>North</b>	Commercial - Restaurant
<b>South</b>	Commercial – Office and parking lots
<b>East</b>	Commercial – Financial Institution
<b>West</b>	Commercial – 39 suite Dwelling, Apartment

**CONTEXT MAP****NOTIFICATION SUMMARY**

**Neighbourhood:** 17 letters mailed out on February 7, 2023, within a 60m radius of the subject parcel notifying the landowners of the proposed development. This also includes the letter that was sent to the Downtown BRZ.

90 response letters were received by the Development Officer. Two of the letters of opposition were received by property owners within the 60m radius, the rest of the opposition letters were received by property owners outside of the 60m radius. Of which, one of the opposition letters received by a property owner was rescinded by way of another email. Two letters of support were received by property owners outside of the 60m radius.

**Neighbourhood Associations(s):** N/A

**LAND USE BYLAW SUMMARY**

**Use: Supportive Housing  
Dwelling, Apartment**

**Discretionary  
Discretionary**

	<b>Required</b>	<b>Requested</b>	<b>Approved</b>
<b>Residents</b>	8 to 25	25	25
<b>Parking:</b>	If there is no change in the gross floor area of the Building a change in use does not require additional parking	N/A	N/A
<b>Submission of a Neighbourhood Communication Plan</b>	Submitted	Submitted and attached	Condition on development permit/must be adhered to

**EVALUATION****Background**

- An application was received on February 1, 2023, to convert a portion of the building for 'Supportive Housing' use. This change of use allows for a maximum of 25 residents in the building to receive supports.

- There is a total of 39 dwelling units in the building. 25 will be "Supportive Housing", One will be Security/Supervisor for the building and the other 13 units in the building would remain as 'Dwelling, Apartment'. These residents in the other 13 units would not be receiving any supports through the supportive housing facility.
- This development is in the Cultural Corridor focus area/Central District in the Heart of our City Master Plan, which states "priority focus for immediate change in the Downtown."
- The Heart of our City Master Plan, built character framework, shows this parcel within the Urban Core.
- The Urban Core and Heritage Blocks have been defined where the 'greatest growth and change ought to focus first. Low-Rise Apartments are an appropriate building type and Live-Work is an appropriate use.
- The pillar 'A Livable Downtown' in the Heart of our City Master Plan speaks about having complete neighbourhoods that should accommodate a diverse population. By nurturing livable urban communities, Downtown will accordingly develop as an open, safe, affordable, accessible, and welcoming place to live.
- The 'An Exciting Downtown' Pillar speaks to, being a great city is as much about culture, arts, night life and a diverse social demographic, as it is about nice neighbourhoods and a healthy economy.
- 'An Accessible Downtown' Pillar states a key goal of the Heart of our City Master Plan is to promote a truly mixed Downtown Residential community that houses people of different ages, backgrounds, lifestyles, and economic status.
- 'A Vibrant Downtown' Pillar states that by creating a high quality urban environment that encourages pedestrian activity, development and intensification opportunities, and accessibility to a diverse community, Downtown Lethbridge will make its most important investment for an economically sustainable future.
- 'Supportive Housing' means development providing accommodation for 8 to 25 residents and associated support programs meant to foster self-sufficiency. This use may include common kitchen and dining facilities, showers and bathrooms, training rooms, relaxation areas and laundry facilities as well as offices and accommodation for staff.
- 'Dwelling Apartment or Apartment Dwelling' means a dwelling comprising of three (3) or more Dwelling Units with shared outside access; three (3) to eight (8) unit Dwellings, which may have separate outside access; or Dwelling comprising of one or more Dwelling Units attached to Uses in Commercial Districts and may include communal dining. All apartment dwelling units are occupiable for periods of not less than one month. This term refers to apartment buildings, three to eight-plexes and apartments attached to Uses in Commercial Districts. Townhouse Dwelling is a separate Use.

- The Development was approved by the Development Officer on March 1, 2023, and advertised in the March 4, 2023, edition of the Lethbridge Herald.

## **CONTEXT**

This application is before the Subdivision and Development Appeal Board because:

- The development permit was appealed.

## **CONSIDERATIONS**

- There is adequate outdoor amenity space for residents and staff on site that is behind the building. This provides the tenants a place where they can enjoy the outdoors.
- In 2021, Planning and Design department did some research to try and gauge what the breakdown of units were in the downtown. There is currently a diverse mix of housing units in the downtown. These include approximately:
  - 51 Supportive housing units
  - 981 Senior citizen housing units
  - 256 Market housing units
  - 78 Affordable housing units

This property is currently calculated under the affordable housing units. With 25 of these affordable housing units being approved as 'Supportive Housing' it would alter these number to be:

- 76 Supportive housing units
- 53 Affordable housing units

Of the 1366 units in the Downtown at that time, the least amount of units are that of 'affordable and supportive' housing types with a total of 129 units.

## **LEGISLATION & POLICY**

### **Land Use Bylaw 6300**

- Parcel is zoned C-D Downtown Commercial District.
  - Purpose: For the development of a variety of commercial, residential, institutional, cultural and recreational uses that incorporate the Heart of our City Campaign pillars of beauty, livability, sustainability, accessibility, vibrancy and excitement in order to achieve the Vision of the Heart of our City Master Plan.
  - Supportive housing facilities are considered to be a compatible use.
  - Supportive housing facilities are discretionary uses in the C-D Downtown Commercial District.
- Division 1, Section 4: Definitions
  - Supportive Housing
- Division 1, Part 3, Section 63 (3) (a) Parking calculation C-D District
- Section 66 – C-D District

### **Municipal Development Plan:**

- **“58 – Promote affordable housing by encouraging and facilitating the adequate supply of housing for all income groups”**
- **“59 – Ensure improvements are made to the availability and accessibility of affordable and supportive housing”**
- **“67 – Ensure a range of types and sizes of residential developments in the downtown are enabled and encouraged by reviewing the regulatory and statutory environment”**
- **“71 – Support innovative ways to achieve affordable housing”**
- **“72 – Support opportunities for municipal and private/public stakeholders to explore initiative that address the community’s need for affordable housing”**
- **“75 – Ensure existing parks and open spaces remain well-loved and well-used by the community, by committing to a continual process of redeveloping, re-envisioning, and reinvesting in these spaces”**
- **“110 – Ensure downtown continues to develop as a strong and vibrant neighbourhood where people can live, work and play”**

- “113 – Promote a sustainable development pattern which makes efficient use of land, minimizes the need for motorized travel and facilitates social cohesion”

### Heart of our City Master Plan

- **Part 3 – The Vision**
  - Vision Statement
    - The Campaign Pillars**
      - A Beautiful Downtown
      - A Livable Downtown
      - A Sustainable Downtown
      - An Exciting Downtown
      - An Accessible Downtown
      - A Vibrant Downtown
- **Part 4 – The Guiding Framework**
  - Urban Core and Heritage Blocks
- **Part 5 – Development Design Guidelines for Urban Core Summary Table**

### South Saskatchewan Regional Plan 2014-2024

#### 5. Efficient Use of Land

##### Objective:

- The amount of land that is required for development of the built environment is minimized over time.

##### Strategies:

5.1 All land-use planners and decision-makers responsible for land-use decisions are encouraged to **consider the efficient use of land principles** in land-use planning and decision-making.

##### Principles:

2. Utilize the minimum amount of land necessary for new development and build at a higher density than current practice.
3. Increase the proportion of new development that takes place within already developed or disturbed lands either through infill, redevelopment and/or shared



use, relative to new development that takes place on previously undeveloped lands.

4. Plan, design and locate new development in a manner that best utilizes existing infrastructure and minimizes the need for new or expanded infrastructure.

## **CONCLUSION**

- Allowable use in downtown, even though it is discretionary, the presumption is that it is appropriate somewhere.
- No evidence that it is not appropriate on this block.
- The building has been in existence since about 1910 and has always housed people.
- The applicant submitted a Neighbourhood Communication Plan, which must be adhered to.
- The use of the building meets or exceeds the requirements in the Land Use Bylaw, the Downtown Area Redevelopment Plan and the Heart of our City Master Plan. All of these plans speak to the livability in the downtown.

# SUBDIVISION AND DEVELOPMENT APPEAL BOARD

221 – 2 Avenue South

DEV14368

# Introduction

- Change of use to allow 25 units for 'Supportive Housing', One unit being used for Security/Supervisor and the remaining 13 units are 'Dwelling Apartment'. There is a total of 39 units in this building.

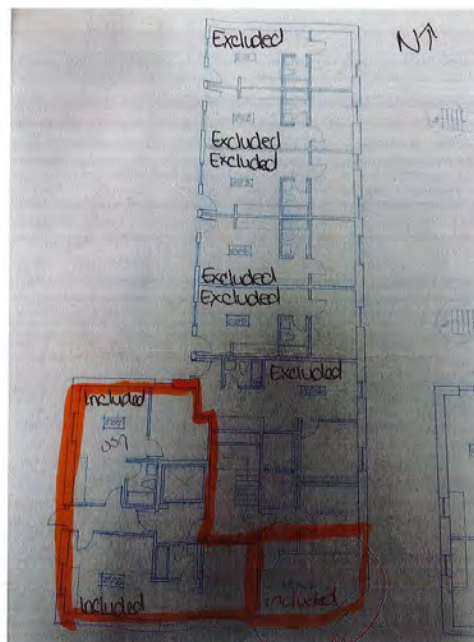
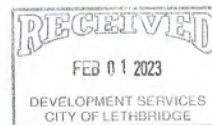


# Background

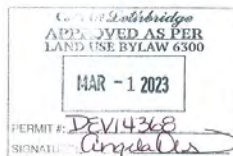
- Existing building approved as 'Apartment-Hotel'
- 'Supportive Housing' – Discretionary Use in C-D District
- 'Dwelling Apartment' – Discretionary Use in the C-D District
- The two uses approved with this development permit are for 'Supportive Housing' and 'Dwelling Apartment', which eliminates the 'Hotel' approval.
- Land Use Bylaw Standards:
  - 8 to a maximum of 25 residents
  - Change of use in the C-D District does not require any additional parking spaces.

# Drawings

DEV14368 215 2 Ave S  
221 2 Ave S



Basement

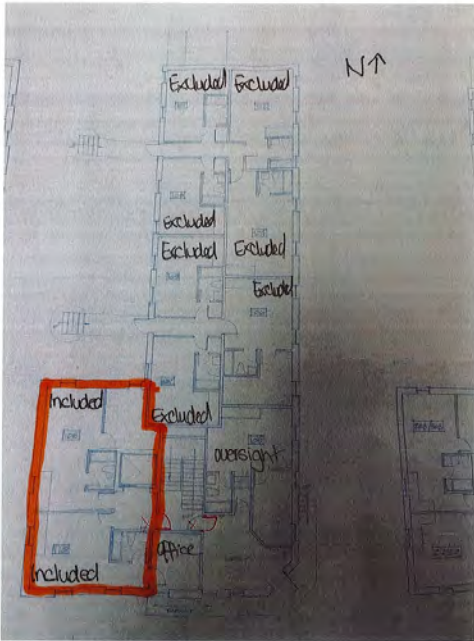


9 units total

3 - supportive housing  
6 - Dwelling, Apartment

# Drawings

DEV14368 915 Ave S  
201 Ave S



RECEIVED  
FEB 01 2023  
DEVELOPMENT SERVICES  
CITY OF LETHBRIDGE

Main floor

APPROVED AS PER  
LAND USE BYLAW 6500  
MAR -1 2023  
PERMIT # DEV14368  
SIGNATURE *[Signature]*

Oversight is  
Security + supervisor

10 units total  
2 - Supportive  
7 - Dwelling Apart.  
1 - Security + supervisor  
(oversight)

# Drawings

DEV 14366 215 DAV  
201 DAV

RECEIVED  
FEB 01 2023  
DEVELOPMENT SERVICES  
CITY OF LETHBRIDGE

All Included

SECOND + THIRD FLOORS - 10 UNITS EACH  
SUITE # AREA

CITY OF Lethbridge  
APPROVED AS PER  
LAND USE BYLAW 6300  
MAR - 1 2023  
PERMIT # DEV14366  
SIGNATURE: *Angela Ols*

gnd + 3rd Floors  
10 x 2 = 20 total  
20 - Supportive Housing

# HEART OF OUR CITY MASTER PLAN AND LAND USE BYLAW

## HOCMP

- Land Use – meets requirements (live/work & low-rise apartment)

## LUB

- Land Use: meets requirements 'Supportive Housing', 'Dwelling Apartment' Discretionary use



# LAND USE IMPACTS

## Parking:

- Supportive Housing residents typically do not own cars
- This building has always housed residents, who may or may not own cars.
- Development approval in 1987 to 'apartment –hotel' did not require the provision of additional parking spaces as it was a change of use.

## Waivers:

- None

## Supportive Housing:

- Neighbourhood Communication Plan required and must be adhered too.

## CONCLUSION

- Allowable use downtown, even though it's discretionary the presumption is that it is appropriate somewhere.
- No evidence that it is not appropriate on this block.
- The applicant submitted a Neighbourhood Communication Plan.

**From:** [Bev Muendel](#)  
**To:** [David Sarsfield](#)  
**Subject:** [External] SDAB public hearing (appeal) on a portion of Castle Apartments  
**Date:** Tuesday, April 25, 2023 10:54:52 AM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

## **SDAB public hearing (appeal) on a portion of Castle Apartments**

To:  
Honourable Mayor Hyggen  
Lethbridge City Councillors

Re:  
SDAB appeal hearing on Castle apartments  
April 27, 2023 5:00 city hall

April 25, 2023

Thank you for the opportunity to present to you reasons in favour of the Lethbridge Housing Authority proposal for Castle Apartments.

As Chair of the Lethbridge Chapter of Friends of Medicare, I am greatly concerned about the health of those unhoused in our city. Research shows that unhoused people have more illnesses, cost healthcare more due to exposure and amputations due to frostbite and die at younger ages than do the average. Thus supporting people into housing is critical and cost effective.

It is difficult for people trying to get back on their feet to find supportive housing. Not only our city, but all of Canada is suffering from lack of appropriate supportive housing. Robin James, the CAO of Lethbridge Housing Authority, has come up with reasonable recommendations to City Council to use some of the Castle apartments for supportive housing for low income individuals, who may require light touch support in order to remain stable in housing.

The specific services for a portion of the Castle apartments would provide 24/7 support including Community Support Workers as well as overnight Support by Security personnel. These supports are critical to ease people in their transition back into housing. Living in housing demands complex skills that need support especially emotional support after trauma. Security is essential for people trying to make a fresh start away from those who would prey upon the most vulnerable in our society.

Adoption of this proposal should be part of a larger city plan to ensure that affordable housing is available throughout the city so that the most vulnerable among us live have the opportunity

to safe lives.

Respectfully submitted,

Bev Muendel-Atherstone  
Chair Friends of Medicare,  
Lethbridge chapter

403-330-2654  
Bjmuendel@gmail.com

Sent from my iPhone

Jillian Hunchak & Dryden Roesch  
#201 303 5 St South  
Lethbridge Alberta  
T1J 2B4

Dear City of Lethbridge Subdivision & Development Appeal Board,

We would like to formally voice our **support** of the supportive housing initiative in the Castle Apartments in downtown Lethbridge (permit #DEV 14368).

I grew up in Lethbridge, and my partner Dryden moved here to attend University in 2014. We have lived in a number of cities over the years and decided to return to Lethbridge two years ago. We made this decision based on the many opportunities that the city has provided us: since our return we have been able to advance our professional careers, reconnect with family, and enjoy the support of a tight-knit and vibrant community.

Last summer we moved into the historical Metcalf building, overlooking Galt Gardens. Despite having lived elsewhere for the past several years, we had grown aware that downtown Lethbridge had been experiencing worsening issues with regards to houselessness and drug use. We were not sure what to expect when beginning our lives downtown.

What we found is a downtown core with a tremendous amount of love and support for its community. Over the past 8 months, we have had the privilege of getting to know the downtown residents, business owners, and the familiar faces that continue to survive and persevere despite all the challenges they face on a daily basis. We have helped our neighbors many times, and we trust that if we ever needed support, the downtown community would be there to help us.

Those that live downtown – and, crucially, have taken the time to get to know its residents – understand the critical need for improved social services to strengthen our community. Those opposed to this initiative have argued that downtown is not an appropriate setting for supportive housing. We strongly disagree with this argument.

We ask that those individuals opposed to the initiative, many of whom also live downtown, consider why they chose to move here in the first place. Those that will benefit from this housing initiative are part of our city. They deserve access to resources, support systems, healthcare, leisure, transit, and all of the amenities that make our downtown worth living in. These resources are what will actively improve the lives of those that need support in our community.

Pushing these initiatives out of the downtown area will only make them less accessible to the people that need them most, and undermine any effort to improve our city. We cannot expect improvement if we do not provide the necessary resources.

Those that will benefit from this initiative are our neighbors and our friends. They live, work, play, and raise families in this city. They deserve access to stable and supportive housing as much as any of us.

We also recognize that none of us are immune to being in the situation that these individuals find themselves. We ask that those opposed to this initiative consider what they would need if they ever

found themselves in a similar situation. This is not an impossibility: Canada is experiencing a cost of living crisis, and Lethbridge is no exception to its effects. We have experienced first hand skyrocketing rent prices and the rising cost of basic necessities. Initiatives like these are greatly needed to address the growing housing crisis.

Those opposing this initiative argue that they want to see Lethbridge grow and thrive – and initiatives like the one before you today is a major step towards achieving this. Without the supportive housing project and others like it, Lethbridge will continue to experience an increase in its unhoused populations. Study after study has shown that when we give people the support they need, they thrive.

We love and trust in our downtown community, and we want to make Lethbridge a place that is welcoming, affordable, and full of opportunity. We intend to grow our lives here and look forward to welcoming our new neighbors to the community.

Sincerely,

Jillian Hunchak & Dryden Roesch

Attention: Subdivision and Development Appeal Board  
 Re: Castle Apartments Appeal Hearing – April 27, 2023

Board members,

As Vice Chair of the Lethbridge Housing Authority and life-long citizen of the City of Lethbridge, I thank you for the opportunity to speak in support of the proposed development.

I have reviewed the appellants submissions, and while I do not dispute the negative experiences they have noted, I do take issue with the suggestion that these experiences will be exacerbated by the addition of supportive housing in the Downtown area.

In my view, the Board has three decisions to make this evening:

1. Does the proposal unduly interfere with the amenities of the neighbourhood?
2. Does the proposal materially impact the use, enjoyment and/or value of the neighbouring properties?
3. Does the proposal align with the strategic and policy direction of the City plans (developed by and for the community at large)?

To address points 1 and 2, I would suggest that the concerns raised by the appellants are reflective of the current situation, which I do not dispute. However, it is not evident or adequately illustrated how the addition of 'supportive housing' would increase the frequency or severity of these negative experiences. Can the appellants explain exactly how the specific proposal would (1) unduly interfere with the amenities of the neighbourhood, and; (2) materially impact the use, enjoyment and/or value of the adjacent parcels?

The letters of opposition illustrate the exact situation that the proposal is trying to address – homelessness. More supportive housing means less individuals experiencing homelessness, and ultimately less of the alleged "vulnerable people" on the streets.

Finally, I put forth that the proposed development aligns directly with the community vision, goals and policies as identified in the City of Lethbridge Municipal Development Plan, Downtown Redevelopment Plan and Housing Strategy. Specifically:

#### **MUNICIPAL DEVELOPMENT PLAN**

##### **Policy 51**

*Support the creation of permanent supportive housing, intox and inpatient/outpatient treatment options in alignment with the Community Drug Strategy and in consideration of the Municipal Housing Strategy, by exploring funding options, grants, and partnerships.*

##### **Policy 59**

*Ensure improvements are made to the availability and accessibility of affordable and supportive housing, by: [...] developing options for changes to the Land Use Bylaw to allow for non-market housing in more land use districts.*

Policy 62

*Support the adequate supply of subsidized units for people on low incomes, by: [...] endorsing applications for land use designation changes which facilitate the development of housing with market or subsidized rents for all.*

**DOWNTOWN AREA REDEVELOPMENT PLAN**

Section 5.5.2 – Livability Goals

4. *To allow for a mix and variety of housing types that reinforces and supports a critical mass of activity and diversity.*

Section 5.5.3 – Livability Policies

1. *Allow for a wide range of housing choices in terms of type, affordability and design in all districts of the Downtown.*
5. *Evaluate residential development proposals, in accordance with a CPTED process to ensure that potential safety and security issues are effectively addressed.*
6. *Collaborate with stakeholder organizations such as the Lethbridge Housing Authority to understand the housing needs in the Downtown.*

**MUNICIPAL HOUSING STRATEGY**

Housing Strategy Goal 2:

*Expand the supply of supportive housing units and units with barrier-free features throughout Lethbridge to help address homelessness and increase housing stability.*

I submit that the Development Officer made the correct decision in approving the proposed development. The decision directly aligns with the above-mentioned policies and objectives that were developed by the City as a result of broad, City-wide community engagement and consultation. The decision to approve the development application for supportive housing reflects the vision and goals of the City of Lethbridge as a whole.

With the understanding that the appellants have not adequately illustrated how the proposed development would ‘unduly interfere with the amenities of the neighbourhood’ or ‘materially impact the use, enjoyment or value of the adjacent parcels’, I conclude that the Board has essentially one singular decision to make:

*Does the proposed development align with the vision, goals and objectives of the City of Lethbridge?*

Respectfully, I submit to you that it does.

Thank you for your consideration.

Hailey Winder  
Vice Chair, Lethbridge Housing Authority



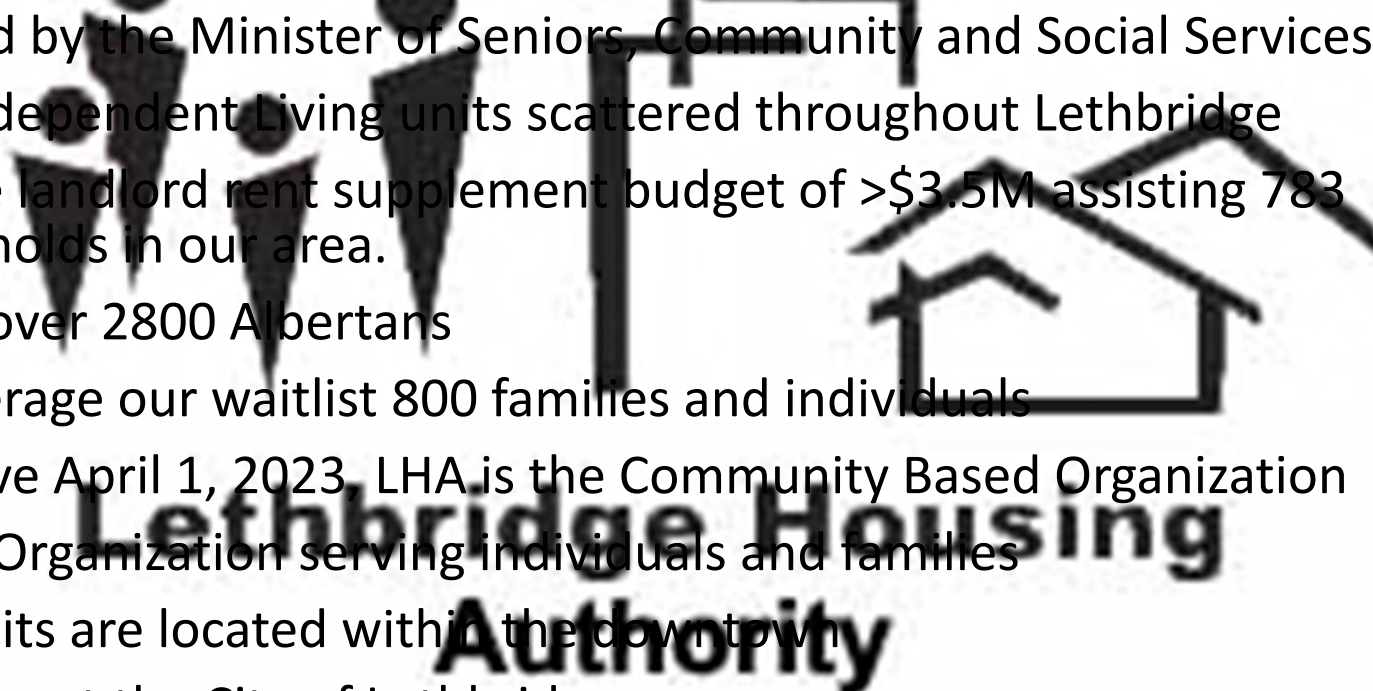
## Lethbridge Housing Authority proposal

Thank you for the opportunity to present a few remarks in support of the Lethbridge Housing Authority proposal for the Castle Apartments. I make these comments based on over 40 years experience working locally, provincially, and nationally on issues related to mental health and addictions.

My remarks will be brief. Approving this proposal from LHA is the right thing to do. From a public health and mental health point of view, this proposal is considered a best practice. Addictions and mental illness are a health issue as well as a social issue. It is also noteworthy that addictions are also mental health disorders and are categorized as such by medical professionals. Individuals coming out of treatment need supports to continue their recovery. This proposal will meet that need. Having a safe place to live as they continue the recovery process is vital to their success. This proposal from the Lethbridge Housing Authority meets that need by providing a safe place to live and recover. These supports will assist them as they reintegrate into society. It will also keep them off the streets. Research has consistently shown that money spent on promoting health and well-being for individuals with addiction and mental health issues pays dividends in the long run and saves taxpayers money, less policing, less social service requirements etc. To echo what many others have previously stated, "Approving this proposal is the right thing to do!" I strongly urge you to approve this proposal.

Robert Campbell, April 27, 2023

# Lethbridge Housing Authority / L&RCHC

- 
- Funded by the Minister of Seniors, Community and Social Services
  - 859 Independent Living units scattered throughout Lethbridge
  - Private landlord rent supplement budget of >\$3.5M assisting 783 households in our area.
  - Serve over 2800 Albertans
  - On average our waitlist 800 families and individuals
  - Effective April 1, 2023, LHA is the Community Based Organization
  - \$15M Organization serving individuals and families
  - 357 units are located within the downtown
  - We are not the City of Lethbridge



Castle  
Apartments  
A Recovery  
Focused  
Solution

# Castle Apartments Ownership

- Joint ownership between Canadian Mental Health Association (CMHA) and Lethbridge & Region Community Housing Corporation (L&RCHC) since 2008; L&RCHC is the NFP charity subsidiary of LHA.
- Operates affordable housing in all 79 units.

# Castle Apartments

- Castle Apartments is comprised of two buildings, specific to this application we are seeking supportive housing at:
  - 221 2<sup>nd</sup> Avenue South
  - Total of 39 units of Self-Contained Housing plus Administrative Office
  - Secure Building – all entry points accessed by key fob
  - Total of 25 rental units, one admin office and one building oversight unit accessed through main door.



# Development Permit – Change of use

- To provide support to (up to) 25 resident's living at 221 2 Ave S.
- Support would include activities such as:
  - referrals to outside organizations for example employment programs, recovery focused health and wellbeing programs, life skill building
  - Social supports
  - Introduction and set expectations for Good neighbour strategy
  - Work with Placement administrator to ensure lease expectation are being met by participates

# Neighbourhood Community Plan

- L&RCHC and CMHA will:
  - Provide well maintained building inside & out
  - Provide contact for L&RCHC 24 hours a day, 7 days a week by calling LHA office.
  - Enforce Guest management policies
  - Promptly investigate concerns regarding client behaviour expressed by neighbours or community members

## Previous Experience Concierge Model

- Operated a Concierge Program on two separate occasions:
  - June 2013 - 2016 when funding from the City was discontinued
  - From 2019 – 2022 when funding from the City was discontinued
  - The Concierge Model has proven effective at keeping people housed when the right supports are in place
  - In 2016 CMHA & L&RCHC released a “Report Card” on the Concierge Program, LPS reported that incidents in and around Castle peaked in 2011, By 2015/2016 incidents were reduced by over 85%. Furthermore, of the incidents reported, only 4 of them were calls to the buildings themselves, the remaining 7 were in the immediate neighborhood.



# Current permitted uses of Castle Apts.

## From the 1986 Land use bylaw:

- **Apartment**

means a dwelling comprising three or more dwelling units with shared outside access; or three- to eight-unit dwellings, which may have separate outside access; or dwellings comprising one or two dwelling units attached to uses in commercial districts. All apartment dwelling units are occupiable for periods of not less than one month. This term refers to apartment buildings, three- to eight-plexes, and apartments attached to uses in

- **Hotel**

means development primarily providing temporary sleeping accommodation in rooms or suites that have shared outside access and that generally do not contain kitchen facilities, and may incorporate eating, drinking, entertainment, convention, sports, recreation, personal service, office and retail facilities as accessory uses. – Daily/ Nightly Rentals