



PO Box 1746
Whitecourt, AB
T7S 1P5

Phone: 780-396-8777
Outreach cell: 780-778-0148
Email: info@SoaringEagleSupportSociety.ca

Schedule B

Supporting Rationale and Operational Overview
3515 Caxton Street – Direct Control Rezoning Application

This document is submitted in support of the proposed redesignation of 3515 Caxton Street from Hilltop Commercial (C-7) District to a site-specific Direct Control (DC) District to allow for a supportive living accommodation. The intent of this application is to establish a clear and appropriate land-use framework for the property's ongoing and proposed uses, ensuring compatibility with surrounding development and alignment with the Town of Whitecourt's regulatory framework.

This application should be understood as a forward-looking request for land use approval that reflects the intended and ongoing use of the property, rather than a characterization of past or current regulatory status.

Community Need and Public Benefit

The proposed supportive housing model directly addresses a persistent and visible need in the Town of Whitecourt. Individuals experiencing housing instability do not operate within predictable systems, and without access to structured accommodation, they often rely on emergency services as a default point of contact. In the absence of stability, interactions with police, emergency medical services, and hospital systems become more frequent, more reactive, and more costly over time. These are not isolated incidents, but repeated cycles that place increasing pressure on local resources and create broader impacts across the community.

The proposed use interrupts that cycle. The facility offers a structured, supervised environment where individuals can stabilize, re-establish routine, and access supports in a consistent and coordinated way. Rather than relying on emergency systems to manage situations as they arise, residents are supported in a setting designed to reduce crises and promote gradual progress toward stability and independence.

The public benefit extends beyond immediate stabilization. By supporting individuals in accessing healthcare, income supports, housing pathways, and community connections, the model contributes to measurable improvements in overall well-being and functioning. This reflects a broader recovery-oriented approach, where success is defined not only by reduced crisis events but by increased capacity for individuals to engage in daily life, build connections, and move toward independence.

From a municipal perspective, the presence of a facility such as Eagle's Nest reduces the frequency and intensity of emergency interactions. Police are less likely to be called to address recurring situations involving the same individuals. Emergency medical services are less frequently engaged for preventable incidents. Hospital visits, particularly those related to unmanaged conditions or instability, decrease when individuals have access to a safe and supportive environment. While these impacts are difficult to quantify precisely on a case-by-case basis, the overall effect is a reduction in demand on public systems and a more efficient use of municipal and provincial resources.

This is not an abstract benefit. It is a practical outcome of providing stability where it would otherwise not exist. Communities that lack this type of transitional and supportive accommodation often experience more visible and unmanaged homelessness, greater strain on local services, and increased costs associated with repeated emergency response. The SESS model helps mitigate these pressures directly and on an ongoing basis, representing a clear and measurable benefit to the community.



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Operational Model

The proposed use is a structured supportive housing model that combines short-term accommodation with on-site support services. This model is designed to provide residents with a place to stay, but it is set in an environment that encourages accountability, routine, and connection to support. The model is designed to meet individuals where they are, while supporting progression toward stability, improved well-being, and more independent living arrangements.

The facility currently supports approximately 30 residents in a coordinated and supervised setting. This scale enables effective service coordination, peer support, and individualized attention while maintaining a manageable, responsive environment.

The operational approach is grounded in active support and system navigation. Staff work directly with residents to access identification, income supports, healthcare, addiction services, and longer-term housing options. This ensures that individuals are not only stabilized within the program but also connected to the broader network of services needed to achieve sustained outcomes.

The model reflects a community-based continuum of care that emphasizes whole-person support across key areas of need. In practice, this includes improving access to safe housing and basic needs, strengthening social connections through peer support, supporting health and life-skills development, and helping individuals engage in meaningful activities and community life. These elements collectively contribute to improved stability and long-term outcomes.

The SESS model is intentionally person-centred and strength-based. Individuals are supported in setting their own goals and making progress at a pace appropriate to their circumstances, with an emphasis on building resilience, skills, and personal capacity. This approach recognizes that progress is not always linear and requires flexibility in both service delivery and expectations, while supporting improvements in key areas of stability, including social connection, personal capacity, and access to essential resources.

The model is also outcomes-focused and aligned with broader accountability expectations. The program emphasizes measurable improvements in stability, including increased engagement with supports, improved housing outcomes, reduced reliance on emergency services, and greater participation in community life. While progress will vary by individual, the model is designed to support observable improvements in overall functioning and long-term stability. Importantly, the SESS model is designed to be adaptive. The organization operates with a commitment to flexibility, innovation, and continuous improvement. As community needs evolve, the program can adjust its approach, strengthen partnerships, and align with local priorities. SESS is prepared to work collaboratively with the Town of Whitecourt to ensure that operations remain responsive, accountable, and compatible with surrounding uses over time.

It is important to recognize that this model does not align with traditional land use categories. It is not a commercial lodging use, as it is not oriented toward the travelling public or short-term occupancy. At the same time, it does not fit within existing small-scale care facility definitions, which are designed for significantly fewer residents and operate under a different model. The SESS model is a hybrid development model that combines residential accommodation and coordinated support services at a scale that reflects real community need.



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Land Use Compatibility

The subject property is well-suited to this use. The development is contained within an existing building and does not involve expansion of the footprint or a change in overall site intensity. The site's physical form remains consistent with its historical use, and the current operation does not introduce new structural impacts beyond those already in place.

The location within a Highway Commercial area provides an appropriate context for this type of use. It offers separation from low-density residential neighbourhoods while maintaining accessibility for service providers, staff, and residents. This balance allows the facility to operate effectively without creating undue impact on surrounding properties.

The proposed Direct Control District ensures that the use is regulated to maintain compatibility with adjacent development. Through site-specific controls, the Town will retain the ability to manage operational considerations, ensure appropriate site maintenance, and address potential concerns at the interface between the facility and surrounding uses. This approach allows for both flexibility and oversight.

Importantly, the operation represents a managed, supervised response to a need that would otherwise manifest in less visible, less regulated ways throughout the community. By concentrating support within a structured environment, the model reduces displacement, loitering, and unmanaged activity in surrounding areas, thereby improving predictability for nearby businesses and public spaces.

The Land Use Bylaw does contemplate care-based and assisted-living-type uses in general. However, those provisions do not clearly or reasonably accommodate the specific operational model proposed at 3515 Caxton Street, particularly given the scale, structure, and integration of support services within an existing building in a Highway/Hilltop Commercial context. As a result, while related categories exist, they do not provide a practical or appropriate regulatory fit for this use on this site.

The issue is therefore not the absence of a relevant concept within the bylaw, but rather the inability of the current district framework to meaningfully capture and regulate this specific form of development. Attempting to force the use into an existing category would require interpretation beyond the intended scope of those provisions and would not provide the clarity or control necessary for effective administration.

In this context, a site-specific Direct Control District represents the most appropriate and defensible planning tool. It allows the Town to recognize the established use, apply tailored regulations that reflect the facility's actual operation, and ensure compatibility with surrounding development, all while maintaining the integrity of the broader Land Use Bylaw framework.



Site-Specific Operations and Compatibility

Current and Typical Resident Count, Including Any Expected Range

The facility accommodates up to 30 residents at any given time, reflecting the operational capacity needed to maintain a structured, supervised environment. Due to natural turnover, approximately 33 individuals are served each quarter. In addition to residents, the facility provides limited access to non-residents for basic support services, including hygiene, food, and access to community resources. These interactions are controlled, occur primarily during daytime hours, and are supervised by staff. This level of activity reflects a managed and predictable use of the site rather than open or uncontrolled access.

Staffing Levels, Including Daytime, Overnight, and Supervision Structure

The operation is supported by a defined staffing structure that ensures consistent oversight. Daytime operations are staffed by two to three personnel, including maintenance, social support, and administrative roles. Evening and weekend periods include dedicated security staff, while overnight supervision is maintained through on-call caretakers residing on site. Additional on-call staff support is available during evenings and weekends. This layered approach ensures the facility maintains continuous oversight and an immediate response capability throughout all hours of operation.

Details on On-Site Management Presence and How the Facility is Overseen

The facility is actively managed through a combination of staff presence, routine monitoring, and established protocols. Staff conduct regular property and facility checks throughout the day, with evening and overnight monitoring supported by security personnel and caretakers. The site is equipped with surveillance systems both internally and externally, along with controlled access points, coded entry systems, and secured areas for staff and residents. Operational rules govern access to resident rooms, shared spaces, and visitor activity, ensuring that the environment remains structured and controlled. A 24-hour contact system further supports continuous oversight and responsiveness.

Parking Demand and How Many Stalls Are Available on Site

Parking demand associated with the facility is modest and consistent with the existing site configuration. During daytime hours, approximately six to nine vehicles are typically present, including staff, service providers, and occasional visitors. Resident vehicle use is limited, with only a small number of vehicles actively in use and many remaining stationary for extended periods. The existing parking supply accommodates this demand without requiring expansion or overflow into surrounding areas.

General Traffic Patterns, Including Staff, Service Providers, and Visitors

Traffic activity is primarily concentrated during daytime hours, generally between 8:00 a.m. and 6:00 p.m., when staff and service providers are present. Vehicle movement is directed through a defined driveway system surrounding the building, with parking concentrated at the front and east side of the site. Evening and overnight traffic is minimal. Occasional off-site parking on Caxton Street may occur, but this is limited and does not represent a consistent or significant impact. The overall traffic pattern reflects stable, low intensity use relative to the site's existing configuration.

Emergency Access Considerations and How First Responders Access the Site

The site is designed to maintain clear, direct access to emergency services at all times. Parking is restricted near primary entrances to ensure unobstructed access. Police and emergency medical services can access the building directly from the front or via the internal driveway system. The site's configuration enables an efficient response without disrupting regular site operations.



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Waste Handling and Pickup Arrangements

Waste management is handled through a structured system that includes both indoor and outdoor collection points. The facility maintains multiple waste and recycling containers and services them frequently throughout the week. Larger waste collection occurs on a scheduled basis through contracted services. This approach ensures that waste is managed consistently and does not accumulate in a manner that would impact surrounding properties.

Description of Outdoor Activity on Site, If Any

Outdoor activity on site is limited in scope and informal. Activities include passive uses such as seating, small group gatherings, and basic gardening. Seasonal maintenance activities such as snow removal and general upkeep are conducted regularly. These activities are typical of residential-style use and do not generate significant noise, traffic, or disruption to adjacent properties.

Security Protocols, Including How Issues Are Managed and Prevented

The facility operates under a comprehensive set of security and operational protocols designed to maintain safety and order. Staff and security personnel conduct regular patrols and respond immediately to any issues that arise. Access to the building is controlled through monitored entry points, and all visitors must check in. Residents are subject to established rules and expectations, with staff trained to manage a range of situations, including conflict, health concerns, and emergency response. The facility maintains emergency procedures, communication systems, and regular staff coordination to ensure that issues are addressed promptly and effectively.

Any Buffering or Separation from Adjacent Properties (Physical or Operational)

The site benefits from existing physical separation and buffering from adjacent properties. Fencing, retaining walls, and building orientation provide clear boundaries, while the surrounding site layout includes significant open space between the building and neighbouring uses. A landscaped setback separates the property from nearby residential areas, and adjacent commercial uses are similarly buffered through site design. These physical features, combined with the controlled nature of operations, ensure that the use remains contained within the property and does not create undue impact on surrounding development.



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Policy and Regulatory Gap

The current Land Use Bylaw does not adequately capture the SESS model. While the bylaw includes references to care-based uses and transitional housing, these provisions are limited in scope and do not reflect the scale or structure of the operation at 3515 Caxton Street. As a result, the proposed use does not align cleanly with any defined land use category within the current bylaw framework. While related categories exist, they do not reasonably accommodate the scale and structure of the proposed operation at this site.

This is not a failure of the operation, but a limitation of the current regulatory structure. The bylaw was not designed for this type of model and, as a result, lacks the flexibility to accommodate it without amendment. The proposed Direct Control District is intended to address this gap in a precise and controlled manner. Rather than requiring a broad change to the underlying zoning framework, it provides a site-specific solution that reflects the property's actual use while maintaining the integrity of the bylaw.

The proposed Direct Control District is consistent with the intent and application of Direct Control provisions as outlined in Sections 4.5.8 and 4.5.9 of the Town of Whitecourt Land Use Bylaw. Section 4.5.8 states that Direct Control Districts are intended to provide flexibility where a proposed development is not otherwise captured or cannot reasonably be facilitated within an existing land use district. This is directly applicable to the subject site. The SESS operating model does not align with any existing district, including Highway Commercial or small-scale care facility definitions, despite being an established and functioning use. The application of a Direct Control District in this instance is not an attempt to circumvent the bylaw, but rather to address a clear regulatory gap where the current framework does not reflect the realities of the use.

Further, Section 4.5.9 contemplates Direct Control as a tool for developments that represent innovative concepts or require a specialized form due to site-specific conditions. The SESS model fits squarely within both categories. It is an integrated form of supportive housing that combines residential accommodation with coordinated services in a manner not typical of conventional land-use categories. At the same time, the proposal is inherently site-specific, relying on an existing building form, location, and operational structure that cannot be easily replicated or relocated within another district without compromising its effectiveness.

Importantly, the proposed Direct Control District does not seek to vary or waive standard development requirements in a manner inconsistent with the intent of the bylaw. Instead, it establishes a tailored regulatory framework that reflects the property's actual use while maintaining compatibility with surrounding development. In this regard, the application aligns with the purpose of Direct Control as a measured and deliberate tool to address unique development circumstances, rather than as a mechanism to broadly alter the underlying zoning framework.



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Public Service Cost Implications

The provision of structured, supportive housing has a direct and measurable relationship to the use of public services. In the absence of stable housing, individuals experiencing housing instability often rely on emergency systems as their primary source of support. This results in repeated interactions with police services, emergency medical responders, and hospital systems, each of which incurs high public costs.

Canadian data demonstrates that these costs accumulate quickly, particularly where individuals cycle through emergency systems over extended periods. Emergency department visits alone typically cost several hundred to over \$1,000 per visit, depending on the nature and severity of the case. Where hospital admission is required, costs increase substantially, with average inpatient stays reaching several thousand dollars per occurrence. These interactions are often not isolated but repeated, creating ongoing demand on the healthcare infrastructure.

The cost of emergency and institutional service use in Canada is well-established and provides important context for evaluating land-use decisions involving supportive housing. Data from the Canadian Institute for Health Information indicates that hospital-based care represents a significant expenditure within the healthcare system, with the average cost of a standard hospital stay in Canada estimated at approximately \$7,000 per admission, depending on complexity and length of stay. Even prior to admission, emergency department visits typically cost several hundred to over one thousand dollars per visit, reflecting the staffing, diagnostic, and facility resources required to provide care. These costs are not isolated; they often recur when individuals lack stable housing and access to consistent support.

Similarly, policing costs are driven by the time and resources required to respond to incidents. Many calls involving vulnerable individuals require multiple officers and extended engagement, including follow-up and coordination with other services. Even routine responses can result in high costs when measured in terms of officer time and operational overhead.

Policing services represent a further area of measurable public cost. Statistics Canada reports that police expenditures in Canada exceed \$19 billion annually, with costs driven largely by personnel time and response requirements. Fully loaded officer costs are typically estimated at \$150 to \$200 per hour. As a result, even relatively routine calls for service involving vulnerable individuals can result in costs exceeding \$1,000 per incident when multiple officers and extended engagement are required. Where individuals are repeatedly engaged through policing services, these costs accumulate rapidly over time.

At a broader system level, national research undertaken through the Mental Health Commission of Canada's At Home/Chez Soi study demonstrates the scale of these impacts. The study found that individuals experiencing chronic homelessness can generate annual public service costs ranging from approximately \$56,000 to over \$130,000 per person, largely as a result of repeated interactions with police, emergency medical services, and hospital systems. These findings reflect the cumulative effect of reliance on crisis-based services in the absence of stable housing.

The proposed use at 3515 Caxton Street directly addresses these dynamics by providing a stable, supervised setting where individuals can access support in a controlled and consistent manner. By reducing the frequency of emergency interactions and shifting individuals away from crisis response systems, the operation contributes to more efficient use of public resources and reduces overall strain on municipal and provincial services. In this way, the facility represents not only a social benefit but also a practical and cost-effective component of the broader service landscape.



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Conclusion

The proposed amendment represents a practical and responsible approach to establishing a clear and appropriate regulatory framework for a beneficial and community-serving use of the property. The SESS model delivers clear and ongoing public benefit by providing stability to individuals in need, reducing reliance on emergency services, and contributing to overall community well-being.

Beyond its immediate impact, the model reflects a coordinated, community-based approach that emphasizes stability, accountability, and measurable outcomes. It is designed to work alongside existing systems by improving access to services and supporting individuals in making meaningful progress toward independence.

SESS is committed to operating as a collaborative community partner. The organization is prepared to adapt, refine its approach, and work with the Town of Whitecourt to ensure the model continues to align with local priorities, respond to emerging concerns, and contribute positively to the surrounding area over time.

By approving the Direct Control District, the Town will take a measured and deliberate step to recognize and regulate a use that is already operating in the community. This approach maintains municipal oversight, ensures compatibility with surrounding development, and supports a model that addresses a real and ongoing need in a constructive, accountable, and locally responsive manner.



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Addendum

References

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