



April 17, 2025

Town of Stony Plain Mayor and Council
Town of Stony Plain
4905 – 51 Avenue
Stony Plain, AB
T7Z 1Y1

RE: Town of Stony Plain - Land Use Bylaw 2719/LUO/25 Update

Dear Mayor Choy and Councillors:

BILD Edmonton Metro (BILD EM) is a non-profit organization representing over 500 companies in the building and development industry. Our members are committed to shaping our region to ensure more people and businesses choose to live, invest, and thrive here.

BILD EM was pleased to be asked to provide feedback on the draft Land Use Bylaw Study Report late last year and our members generally support the goals of gentle densification, accessory dwelling units (ADUs), and residential district consolidation. These initiatives reflect an important step toward modernizing land use policies while addressing community growth and housing needs.

Unfortunately, the subsequent draft LUB amendment which received first reading was not circulated to BILD EM for feedback in advance. While administration has been helpful and receptive to discussions subsequent to the bylaw coming before Council, our membership is disappointed that there was no opportunity to review the proposed changes in advance. BILD EM is well positioned to be a partner on regulatory changes, and a proactive approach to changes that impact the land development and home building industry is encouraged. BILD EM provides the following commentary for consideration in advance of second reading.

Zero Lot Line (ZLL) Percentages

While BILD Edmonton Metro supports the removal of the ZLL overlay figure and associated amendment process, we do not support an amendment that exerts specific control over a single type of housing product. Adding a regulation to control the percentage of ZLL product is not in line with the Town's goals of removing barriers to development. The ability to monitor this type of regulation can only be accomplished at the subdivision level, requiring additional staff time, additional application requirements for new subdivision stages, and a measurable tracking system to ensure the percentage balances over a neighborhood. The alternative, where each



subdivision stage must meet the desired ratio, will result in slower growth as policy dictates what the market can provide, and what customers wish to purchase.

If Town Council chooses to proceed with a regulation to control ZLL product, BILD EM suggests increasing the neighbourhood percentage to at least 30%, in alignment with other neighbourhoods in the region, instead of 50% for each individual subdivision. As outlined in the previous paragraph, the 50% per subdivision regulation will likely result in challenges, because smaller stages may exceed the 50% based on a function of the layout. A neighbourhood-based percentage may better guide subsequent stages which can be balanced over the larger development area rather than for each stage, ensuring the cap is still met.

Zero Lot Line Real Property Report Timing

Another proposed amendment requires a Real Property Report (RPR) be provided for review prior to the start of framing to prove the location of foundations. Not only will this regulation cause delays in building timelines, but it also presents a greater hazard in new neighborhoods by significantly increasing the amount of time open excavations are present in the community with no work taking place on site. This regulation adds a redundant level of oversight to a risk which is already properly and rightly managed by builders, who are responsible for improper placement of buildings based on their permit approvals.

Council can be assured that our membership shares their concern about the placement of foundations. Builders recognize their responsibility to remediate any problems, and are highly motivated to get it right the first time.

BILD EM members are grateful for the opportunity to provide Council our feedback about the proposed LUB amendment. We look forward to ongoing dialogue with administration so that we can work in partnership to create communities where more people choose to live, invest and thrive. We also encourage administration to reach out and share upcoming amendments in advance of being tabled in front of Council, so that changes put forward consider the impacts to industry as well as the needs of community members.

Thank you for considering our input for potential revisions after the scheduled public hearing.

Sincerely,



Lindsey Butterfield, RPP
VP, Government Relations and Policy



BILD Edmonton Metro

CC: Tom Goulden, Town Manager, Stony Plain
Christina Michaud, Legislative Coordinator, Stony Plain
Brett Newstead, General Manager of Planning and Infrastructure
Kalen Anderson, CEO, BILD Edmonton Metro
Reanna Rehman, Chair, BILD Edmonton Metro Regional Committee
Jamie Kitlarchuk, Chair, BILD Edmonton Metro Stony Plain Regional Subcommittee