



**CITY OF HAMILTON**  
**PLANNING AND ECONOMIC DEVELOPMENT DEPARTMENT**  
**Planning Division**

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| <b>TO:</b>                | Chair and Members<br>Planning Committee  |
| <b>COMMITTEE DATE:</b>    | September 6, 2024  |
| <b>SUBJECT/REPORT NO:</b> | Self-Storage Facilities Review (CI-24-E) (PED24135) (City Wide)  |
| <b>WARD(S) AFFECTED:</b>  | City Wide  |
| <b>PREPARED BY:</b>       | Lucas Mascotto-Carbone (905) 546-2424 Ext. 1287  |
| <b>SUBMITTED BY:</b>      | Anita Fabac<br>Acting Director, Planning and Chief Planner<br>Planning and Economic Development Department |
| <b>SIGNATURE:</b>         |  |

**RECOMMENDATION**

- (a) That the Self-Storage Facilities Policy Review Report, attached as Appendix “A” to Report PED24135, be received;
- (b) That staff be directed and authorized to undertake public and stakeholder consultation on the Self-Storage Facilities Policy Review Report, in Q4, 2024;
- (c) That staff report back to Planning Committee summarizing input from the public and stakeholder consultation with recommended amendments to Zoning By-law No. 05-200 in 2025.

**EXECUTIVE SUMMARY**

At the February 19, 2019, meeting of Planning Committee, Committee received PED19029 - Modifications and Updates to the City of Hamilton Zoning By-law No. 05-200. As part of Council’s amendments to the recommendations of that Report, staff were directed to undertake a review of where self-storage facilities are located and permitted within the City of Hamilton. In response, staff retained MacNaughton Hermsen Britton Clarkson Planning Limited (“MHBC Planning”) in April 2023 to conduct a research paper and best practice review of self-storage facilities. The Self-Storage Facilities Policy Review Report (“MHBC Report”), attached in Appendix “A” to Report

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PED24135, assesses the changing dynamic of self-storage use and examines how new self-storage facilities could be integrated into more zones and areas of the City.

The MHBC Report attached in Appendix “A” to Report PED24135 contains:

- A review of the current location of self-storage facilities;
- An overview on the evolution of self-storage facilities as a use;
- Examples of how municipalities across Ontario have implemented zoning regulations for the use on a site-by-site basis; and,
- A review of Hamilton’s current policy framework and zoning permissions.

The MHBC Report also provides several recommendations for updates to the permission for self-storage facilities in Hamilton Zoning By-law No. 05-200, including:

- Proposing options for a new or modified definition of “Self-Storage Facility”;
- Permitting self-storage facilities in certain Commercial and Mixed-Use Zones, Downtown Zones, and Transit Oriented Corridor Zones;
- Allowing flexibility in the location of self-storage facilities within buildings including ground floor or street-facing facades; and,
- Preserving permissions for traditional self-storage facilities in Industrial zones.

The MHBC Report recommends that staff consider the proposals above and conduct further evaluation and consultation to inform the development of updated regulations for Zoning By-law No. 05-200. Staff are seeking direction to gather input on the Self-Storage Facilities Policy Review Report through public and stakeholder consultation to take place in Q4, 2024.

### **Alternatives for Consideration – See Page 9**

### **FINANCIAL – STAFFING – LEGAL IMPLICATIONS**

Financial: N/A

Staffing: N/A

Legal: N/A

### **HISTORICAL BACKGROUND**

Traditionally, self-storage facilities have been designed with convenient direct vehicular access to individual units, allowing patrons to park in front and load/unload items easily. They commonly consist of rows of single-storey linear buildings with access from one or both sides through large overhead doors, separated by drive aisles. The premises are usually enclosed by fencing and secured by a gated entry. These facilities usually

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include an office/administrative building for business operations of the facility and for accessory purchases like moving supplies. These facilities often require minimal servicing, occupy significant tracts of land, and resemble warehouses. For these reasons, they have typically been in industrial or arterial commercial areas.

The self-storage industry has experienced changes in response to shifting demands. Increased remote work, downsizing, family transitions, apartment living, and small businesses' needs have led to a surge in demand for storage facilities. As a result, self-storage companies are adopting modern designs and multi-storey structures, along with offering extra services. Newer facilities provide diverse unit sizes and incorporate features such as indoor drive-in bays, 24/7 secure access, and various auxiliary services like parcel reception, document management, boardroom spaces, and even retail stores. The evolving nature of self-storage has led to outdated policy and zoning regulations, necessitating zoning amendments to accommodate the changing built form and additional services provided.

At the February 19, 2019, Planning Committee meeting, Committee received Modifications and Updates to the City of Hamilton Zoning By-law No. 05-200 (PED19029). As part of Council's amendments to the recommendations of that Report, staff were directed to undertake a review of where self-storage facilities are located and permitted within the City of Hamilton. Staff subsequently contracted MHBC Planning to undertake an assessment of the self-storage use and examine how new self-storage facilities could be integrated into more urban zones and areas of the city in an appropriate manner in response to the evolving nature of the use.

## **POLICY IMPLICATIONS AND LEGISLATED REQUIREMENTS**

### **1.0 Provincial Policy Framework**

The Provincial planning policy framework is established through the *Planning Act* (Section 3), the Provincial Policy Statement (PPS 2020), A Place to Grow: Growth Plan for the Greater Golden Horseshoe 2019, as amended (Growth Plan) and the Greenbelt Plan (2017). The *Planning Act* requires that all municipal land use decisions affecting planning matters be consistent with the Provincial Policy Statement and conform to the Growth Plan and the Greenbelt Plan.

The mechanism for the implementation of the Provincial plans and policies is through the Official Plan. Through the preparation, adoption, and subsequent Ontario Land Tribunal approval of the Urban and Rural Hamilton Official Plans, the City of Hamilton has established the local policy framework for the implementation of the Provincial planning policy framework.

## **2.0 Urban Hamilton Official Plan**

Warehousing uses, facilitating self-storage facilities as defined in the Zoning By-law, are permitted but not specifically defined in the Urban Hamilton Official Plan. Volume 1, Policy E.2.4.7 references warehouse permissions in Urban Corridors, supporting retail stores requiring outdoor storage or having a warehouse-type character, as well as services for traveling or drive-by consumers. Policies E.4.8.1 and 4.8.2 permit mini warehousing and enclosed storage, akin to the traditional self-storage format, within the Arterial Commercial designation. In the Employment Area designation, Policy E.5.2.4 permits clusters of business and economic activities, including warehousing, within Employment Areas. Additionally, ancillary uses that primarily support businesses and employees within the Employment Area are also permitted.

The Urban Hamilton Official Plan emphasizes compact, mixed-use urban environments that maximize land use efficiency, support transit, and aims to support the needs of a growing population. Integrating uses into mixed use developments supports the needs of a growing residential population in mixed use areas.

The Rural Hamilton Official Plan restricts uses to agricultural practices and other sensitive activities. Warehouses and self-storage facilities are not permitted within the Rural Area.

## **RELEVANT CONSULTATION**

The MHBC Planning report findings (attached as Appendix “A” to Report PED24135), have been shared with Planning and Economic Development Department staff. They will continue to be consulted as updated self-storage permissions and regulations are drafted.

## **ANALYSIS AND RATIONALE FOR RECOMMENDATION**

Furthered by evolving social, economic, and demographic factors, there is an increasing demand for self-storage facilities in accessible locations throughout the City of Hamilton. This trend reflects the community's need for convenient and flexible storage solutions to meet various lifestyle needs.

### **What zones currently permit self-storage facilities?**

Currently, the self-storage use is included within the definition of a warehouse as a "Mini Storage Facility". The use is permitted in multiple Industrial zones and the Arterial Commercial (C7) Zone in Hamilton Zoning By-law No. 05-200.

### **Industrial Zones**

- Research and Development (M1) Zone
- Prestige Business Park (M3) Zone
- Business Park Support (M4) Zone
- General Industrial (M5) Zone
- Light Industrial (M6) Zone
- Airside Industrial (M7) Zone
- Airport Light Industrial (M10) Zone
- Airport Prestige Business (M11) Zone
- Shipping and Navigation (Port Lands) (M13) Zone
- Shipping and Navigation (East Port) (M14) Zone

### **Commercial Zones**

- Arterial Commercial (C7) Zone

Note: There are no permissions for Warehouses or Self-Storage Facilities within the Rural Zones of Zoning By-law No. 05-200.

### **Where are self-storage facilities currently located in Hamilton?**

An assessment of self-storage facilities in the city was undertaken. Based on 2023 data from the Municipal Property Assessment Corporation, Hamilton ranked fourth in Ontario for self-storage space, with 1,049,608 ft<sup>2</sup> gross floor area, trailing Toronto, Ottawa, and Mississauga. Anticipated growth in high density residential projects throughout the city is expected to increase demand for self-storage. Currently Hamilton has over 30 self-storage facilities in varying forms and size, the locations of which are identified on a map attached as Appendix “B” to Report PED24135. Self-storage facilities located in the rural area were permitted either through site-specific zoning permissions or are legal non-conforming uses as they pre-date the current rural zoning regulations.

### **What regulations currently exist for self-storage facilities in permitted zones?**

Since self-storage facilities fall under the Warehouse use, specific built form regulations are not provided in Hamilton Zoning By-law No. 05-200. With the exception of the Research and Development (M1) Zone, which stipulates that Warehouses can only be permitted within existing buildings, the regulations reflect the built form permissions of each zone. This ensures simplicity, consistency, and uniformity in the urban landscape, as zoning regulations dictate aspects like building height, setbacks, and gross floor areas per use.

### **Self-Storage Facilities Report Recommendations**

The self-storage industry has evolved due to increased remote work, downsizing, family transitions, high-density living, and small business needs, resulting in a surge in

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demand for storage facilities. The rapid evolution of self-storage facilities and the services they offer has led to outdated zoning permissions in many municipalities, necessitating zoning amendments to accommodate this changing use. Contemporary mixed use self-storage facilities are a relatively new form of development, thus leading to a lack of comprehensive approaches to self-storage facilities in other municipalities aside from site-specific examples. The MHBC Report (attached as Appendix "A" to Report PED24135), provides an analysis of modern self-storage facilities across different municipalities in Ontario and how each of those municipalities have implemented specific zoning regulations to fit the use on a site-by-site basis.

Given the evolving nature of self-storage, attention is required to understand the demand, appropriate locations, and policy framework to integrate contemporary self-storage facilities into urban areas effectively.

### **1.0 Urban Hamilton Official Plan**

Warehousing, which encompasses self-storage facilities, is currently permitted in the Employment Area and Arterial Commercial designations. To ensure appropriate permissions within the Urban Hamilton Official Plan and uniformity across policy levels, the MHBC Report recommends the City clarify the classification for self-storage facilities as either an employment or commercial use. Updates to the Urban Hamilton Official Plan may be required should the permissions for the use be expanded.

### **2.0 Creation of a Self-Storage Facility Definition**

Presently, self-storage facilities are permitted in 10 of 14 Industrial Zones and the Arterial Commercial (C7) Zone, categorized under the broad definition of Warehouse use:

“The use of building or structure, or part thereof, for the bulk storage or distribution of goods to industrial, commercial, or institutional business users or other wholesalers, but shall not include the retailing of goods to the general public. A Warehouse may include a Mini Storage Facility but shall not include a Waste Management Facility, Salvage Yard, or Towing Establishment.”

However, terminology for self-storage facility uses is unclear within the Warehouse definition, with the term "Mini-Storage Facility" leading to potential misinterpretations. To ensure clarity and consistency, the MHBC Report recommends that a new definition specific to self-storage facilities be added to Hamilton Zoning By-law No. 05-200. This definition could encompass self-storage facilities both as standalone entities and as integrated parts of mixed-use developments.

Self-storage facilities can vary widely in form, from traditional single-storey layouts to multi-storey standalone structures, to a use integrated into a mixed-use building or development. Many self-storage companies now include ancillary uses as part of their business models. To capture this variation, a definition would need to build in flexibility for built form and ancillary uses.

### **3.0 Addition of Self-Storage as a Permitted Use in Various Zones**

Traditional self-storage facilities were typically independent structures with limited ancillary uses. However, the trend is shifting towards integrating them as smaller components within mixed-use developments, especially in urban settings. The permissions for integrating self-storage facilities in larger developments could be expanded based on various approaches.

The MHBC Report recommends that the self-storage facility use be added as a permitted use to additional zones within Hamilton Zoning By-law No. 05-200 as follows:

#### **Full Use Permission Zones**

- District Commercial (C6); and,
- Arterial Commercial (C7).

The District Commercial (C6) Zone enhances street presence by clustering establishments in plazas or bringing them closer to collector and arterial roads. Permitted uses include retail and service commercial establishments, such as commercial entertainment venues, convention centres, mixed-use dwelling units, gas bars, motor vehicle rental establishments, retail stores, and offices. The MHBC Report recommends expanding permissions to this zone as its focus on commercial uses is compatible with self-storage facilities, particularly when these facilities are clustered with ancillary services.

#### **Restricted Use Permission Zones**

- Community Commercial (C3);
- Mixed Use High Density (C4);
- Mixed Use Medium Density (C5);
- Transit Oriented Corridor Mixed Use (TOC1);
- Transit Oriented Corridor Local Commercial (TOC2);
- Transit Oriented Corridor Multiple Residential (TOC3);
- Transit Oriented Corridor Mixed Use High Density (TOC4);
- Downtown Central Business District (D1); and,
- Downtown Mixed Use (D3).

The MHBC Report recommends permitting self-storage facilities with restrictions in Transit Oriented Corridor Zones, as a use within mixed-use developments, with a limit on the percentage of gross floor area dedicated to self-storage to support a variety of other uses including residential and commercial. Additionally, the report recommends self-storage facilities be allowed in some Downtown Zones as part of mixed-use developments, with a limit on the percentage of gross floor area dedicated to self-storage to prevent detracting from the area's primary function. This approach could also facilitate the conversion of underutilized office buildings.

### **Zones where Self-Storage Facilities are not Recommended**

- Mixed-Use Medium Density – Pedestrian Focus (C5a) Zone and the Downtown Mixed Use – Pedestrian Focus (D2) Zone.

These uses are generally dependent on access via patrons without vehicles. Therefore, MHBC Planning recommends that self-storage facilities not be permitted in zones intended to focus on pedestrian access with high pedestrian traffic, as found within the C5a and D2 Zones.

- Downtown Residential (D5) Zone and Downtown Multiple Residential (D6) Zone.

The focus of these areas is to allow for a range of housing forms and create opportunities for integration of retail and commercial uses to meet the daily needs of residents. These areas assist in contributing to the character and history of the Downtown and the City as a whole.

The above noted zones are intended to encourage an active pedestrian environment that incorporates commercial uses along with their built form and aim to meet the needs of residents and visitors while creating inviting pedestrian surroundings that both preserve and enhance stable residential areas. These mandates for the zones are therefore not compatible with the varying forms of a self-storage facility.

## **4.0 Parking**

The MHBC Report highlights that self-storage facilities, due to their operational nature and internal loading/unloading spaces, require minimal parking. It recommends incorporating self-storage facilities into the Zoning By-law's parking standards to accommodate secondary uses and support diverse transportation options. The MHBC Report recommendations, along with the recommendations that result from the non-residential phase of Transportation Planning Services' Parking Standards Review, will inform the development of appropriate parking standards for self-storage facilities across various zones.



## **NEXT STEPS**

Further analysis of these recommendations is contained in the Self-Storage Facilities Policy Review Report (Appendix “A” attached to Report PED24135).

Staff concur that the modern self-storage format should be considered in an expanded set of zones. Staff also acknowledge that determining the appropriate zones requires careful consideration of each zone's intent, geographic distribution, compatibility with permitted uses and relevant zone permissions and restrictions. This approach will ensure that expanded permissions for self-storage facilities is comprehensively evaluated and carefully considered.

Staff will take the recommendations of the MHBC Report to inform the development of updated self-storage policy permissions and regulations in Hamilton Zoning By-law No. 05-200, and undertake public and stakeholder consultation in Q4, 2024. It is anticipated that staff will report back summarizing input from the public and stakeholder consultation and with recommended amendments to Zoning By-law No. 05-200 in 2025.

## **ALTERNATIVES FOR CONSIDERATION**

Council may choose to maintain the status quo and not direct staff to update self-storage facility permissions and provisions regulating the use which may necessitate future Zoning By-law Amendment applications for proposed self-storage facilities.

## **APPENDICES AND SCHEDULES ATTACHED**

Appendix “A” to Report PED24135 – MHBC Self-Storage Facilities Policy Review  
Report

Appendix “B” to Report PED24135 – Map of Current Locations of Self-Storage Facilities  
in Hamilton

LMC:sd