

To: Mayor and Members of Town of Tillsonburg Council

From: Amy Hartley, Development Planner, Community Planning

**Applications for Official Plan Amendment and Zone Change
OP 26-01-7 and ZN 7-26-01 – 2780480 Ontario Inc.**

REPORT HIGHLIGHTS

- The purpose of the Official Plan Amendment is to amend the Service Commercial policies affecting the subject lands to add a warehouse as a permitted use to accommodate a self-storage facility.
- The Zone Change application proposes to amend the 'Service Commercial with holding provisions (SC)(H)' to permit the self-storage facility as a permitted use and to remove the holding provisions respecting potential contamination of the site.
- Planning staff are recommending support of the applications as the proposal is generally consistent with the relevant policies of the Provincial Planning Statement and the Official Plan policies with respect to development within the Service Commercial designation.

DISCUSSION

BACKGROUND

OWNER: 2780480 Ontario Inc. (c/o Ceara Huigenbois)
10 Elm Street, Tillsonburg, ON N4G 0A4

AGENT: LandPRO Planning Solutions Inc.
204-110 James Street, St. Catharines, ON L2R 7E8

LOCATION:

The subject lands are described as Lots 417, 418 and 419, Plan 500, in the Town of Tillsonburg. The subject lands are located at the southeast corner of First Street and King Street and are municipally known as 61 First Street, Town of Tillsonburg.

COUNTY OF OXFORD OFFICIAL PLAN:

Existing:

Schedule "T-1"	Town of Tillsonburg Land Use Plan	'Service Commercial' with site-specific policies as per Section 8.3.3.4.3
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Proposed:

Schedule "T-1"	Town of Tillsonburg Land Use Plan	'Service Commercial' with site-specific policies to permit a self- storage use
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TOWN OF TILLSONBURG ZONING BY-LAW 3295:

Existing Zoning: 'Service Commercial Zone with Holding Provisions (SC)(H)'

Proposed Zoning: 'Special Service Commercial Zone (SC-sp)'

PROPOSAL:

The purpose of the Official Plan Amendment is to amend the existing Service Commercial policies affecting the subject lands to add a warehouse as a permitted use to facilitate the development of a self-storage warehousing use.

The Zone Change proposes to amend the 'Service Commercial Zone with Holding Provisions (SC)(H)' to remove the holding provisions which are in place to ensure that orderly development of land identified by the Ministry of the Environment as contaminated lands are remediated as required. Additionally, the Zone Change will add a warehouse as a permitted use. Additionally, the applicant is requesting site-specific provisions to permit a reduced landscaped open space on the subject lands from 15% to 9.5% as well as a reduced parking requirement of zero spaces due to the nature of the proposed business.

The lands are approximately 3,459.5 m² (37,237.7 ft²) in area and are currently vacant. The applicant is proposing to establish a self-storage warehousing facility consisting of three separate buildings, covering approximately 975 m² (10,494.8 ft²) of the subject property. Access to the property is proposed from First Street.

Surrounding land uses include commercial businesses fronting Concession Street East, the Town of Tillsonburg Fire Hall and OPP facility, and medium and high density residential uses.

Plate 1, Location Map and Existing Zoning, indicates the location of the subject property and the existing zoning in the immediate vicinity.

Plate 2, Aerial Map (2025) with Existing Zoning, provides an aerial view of the subject lands and surrounding uses as existing in the Spring of 2025.

Plate 3, Applicant's Sketch, identifies the general site plan as provided by the applicant.

APPLICATION REVIEW

2024 PROVINCIAL PLANNING STATEMENT

The Provincial Planning Statement is a policy statement issued under Section 3 of the Planning Act that applies to all decisions in respect of the exercise of any authority that affects a planning matter made on or after October 20, 2024. The following outlines the key PPS policies that have been considered but is not intended to be an exhaustive list.

Chapter 1, Introduction, states that a prosperous and successful Ontario will also support a strong and competitive economy that is investment-ready and recognized for its influence, innovation and diversity. Ontario's economy will continue to mature into a centre of industry and commerce of global significance. Central to this success will be the people who live and work in this province.

Chapter 2 focuses on fostering sustainable, inclusive and competitive communities by ensuring well planned growth that meets the needs of current and future populations. Section 2.1 establishes the importance of maintaining sufficient land for housing and employment growth, supporting diverse land uses, and creating complete communities that are accessible and equitable.

Section 2.3.1, General Policies for Settlement Areas, directs that Settlement Areas shall be the focus of growth and development. Further, land use patterns within Settlement Areas shall be based on densities and a mix of land uses which:

- a) efficiently use land and resources;
- b) optimize existing and planned infrastructure and public service facilities;
- c) support active transportation;
- d) are transit-supportive, as appropriate; and,
- e) are freight supportive.

Section 2.8.1 Supporting a Modern Economy, outlines that Planning authorities shall promote economic development and competitiveness by providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs. It also encourages intensification of employment uses and compatible, compact, mixed-use development to support the achievement of complete communities.

Chapter 3 Infrastructure and Facilities, establishes that infrastructure and public service facilities shall be provided in an efficient manner while accommodating projected needs.

Section 3.1 outlines that planning for infrastructure and public service facilities shall be coordinated and integrated with land use planning and growth management so that they:

- a) are financially viable over their life cycle, which may be demonstrated through asset management planning;
- b) leverage the capacity of development proponents, where appropriate; and
- c) are available to meet current and projected needs.

Section 3.6 Sewage, Water and Stormwater, notes that planning for sewage and water services shall accommodate forecasted growth in a timely manner that promotes the efficient use and optimization of existing municipal sewage services and municipal water services.

Section 5.3 Human-Made Hazards permits development on, abutting or adjacent to lands affected by petroleum resource operations only if rehabilitation or other measures to address and mitigate known or suspected hazards are under way or have been completed.

OFFICIAL PLAN

The subject lands are designated 'Service Commercial', with a special policy area which recognizes the former industrial site, rail line and fuel distribution centre and that any redevelopment will be contingent upon a determination that occupants or any commercial structure will not be subject to health or safety risks.

Section 8.3.3 establishes that areas designated Service Commercial are intended for a broad range of commercial uses that, for the most part, are not suited to locations within the Central Area because of requirements for site area, access, or exposure, or, due to compatibility conflicts with residential development.

Permitted uses within the Service Commercial Area include hotels, motels, conference facilities, automotive sales and services, furniture warehouses, personal services, convenience commercial uses, gas bars, car wash facilities, fast food outlets, retail food stores, and uses which require large areas for on-site storage of goods.

Scale-related requirements in the Service Commercial designation generally range from 3,500 square feet to 50,000 square feet. Uses of less than 3,500 square feet will be encouraged to be located in the Central Area.

Uses in the Service Commercial designation will generally be located with direct access or access via a service road to arterial and collector roads. Appropriate setbacks will be applied through the Zoning By-law to provide for the development of sites large enough to accommodate free-standing buildings and on-site parking.

Section 3.3.3.2 outlines the requirements for Sites of Potential Environmental Contamination whereby suspected sites of potential environmental contamination are permitted to be redeveloped where it has been determined that such development will not result in health or safety risks to citizens. Additionally, the proponent is required to undertake site assessments in accordance with the relevant provisions of the Environmental Protection Act and other applicable legislation.

ZONING BY-LAW

The subject property is zoned 'Service Commercial Holding Zone (SC)(H)' in Town of Tillsonburg Zoning By-Law No. 3295. As noted, the applicant proposes to remove the Holding provision and redevelop the site for a self-storage business use.

The purpose of the Holding Provision on the subject lands as outlined in Section 14.3.1 of the Zoning By-law is to ensure that lands identified as contaminated are remediated in accordance with the Ministry of Environment, Conservation and Parks requirements. The Holding Provision may be removed once MECP approval of the Record of Condition is received and the owner has entered into a site plan agreement with the Town. Permitted interim uses are existing uses, buildings and structures as they legally existed at the date of adoption of the Zoning By-law. Any additions or new uses require a zoning amendment.

The SC zone provisions require 15% minimum landscaped open space, and in this instance, the applicants are requesting site-specific permissions to allow a reduced landscape requirement of 9.5% open space.

The proposed use of the subject lands would be considered a warehousing use under the parking provisions which require 1 parking space per 200 m² (2,152 ft²) of gross floor area. The applicants are requesting that no parking be required due to the nature of the business.

AGENCY COMMENTS

Tillsonburg Hydro, Southwestern Public Health, Oxford County Public Works, Town of Tillsonburg Engineering Department and Canada Post had no concerns with the subject proposal.

Town of Tillsonburg Chief Building Official noted that while a Record of Site Condition is not required for the proposed use, the site should be remediated to ensure that any contaminants do not migrate into the Town's road allowances. Additionally, site plan approval is required for the proposed use.

PUBLIC CONSULTATION

Notice of complete application and notice of public meeting regarding this application were circulated to surrounding property owners on April 7, 2026, and April 13, 2026, respectively, in accordance with the requirements of the Planning Act. As of the writing of this report, no concerns have been raised by the public.

Planning Analysis

The Town of Tillsonburg and the County of Oxford have received applications to amend the Official Plan and the Town's Zoning By-law to enable the establishment of a self-storage facility, approximately 975 m² (10,494.8 ft²) in size. The applicant has further requested site-specific zoning provisions for reduced open landscape requirements and relief from required number of parking spaces.

In support of the application a Planning Justification Report, a Phase I Environmental Site Assessment Report, Servicing Drawings, Traffic Brief, and Stormwater Management Report were submitted.

Supporting Studies

Phase I Environmental Site Assessment (ESA)

The Phase I ESA, prepared by Agostinelli Consulting Inc., identified that the subject site previously operated as an Imperial Oil Bulk Petroleum Plant until approximately 2005. Based on a review of the historical uses, soil and groundwater quality and characteristics in the area, it was identified that the site is contaminated with petroleum hydrocarbons and will require further investigations and remediation. It was noted in the assessment that to develop the site for storage units, a Record of Site Condition is not required, and will require limited additional investigations. Additional investigation include groundwater conditions and mitigation controls will be investigated to reduce the potential off site groundwater impacts and/or vapour migration risks.

A follow up letter from the consultant confirmed that a monitoring well assessment is required to locate and decommission existing wells, ongoing groundwater monitoring, and a soil vapour assessment is required to evaluate potential risks associated with soil vapour. The recommendations provided by the consultant will be reviewed and implemented through the site plan approval process.

Traffic Brief

A Traffic Brief, prepared by Asurza Engineers, assessed the traffic for the proposed facility. It is noted in the brief that a 'mini-warehousing' facility will typically generate 1 additional trip during weekday morning peak hour, and 2 additional trips during a typical weekday afternoon peak hour, resulting in a minor and negligible impact on local roads and current traffic operations.

Stormwater Management Report

The Stormwater Management Report prepared by MC Engineering, concluded that the stormwater will be directed to an on-site storm sewer system and discharged to the municipal stormwater sewer. The proposed on-site storage exceeds the required amount for a 100-year storm event.

Provincial Planning Statement (PPS) 2024

It is the opinion of staff that the proposal is consistent with the relevant policies of the Provincial Planning Statement. The proposed self-storage development promotes an appropriate land use mix and the efficient use of land and infrastructure within a settlement area. Further, the proposed use of the lands promotes a compact commercial activity in the Service Commercial Area that will serve nearby residents.

The applicants have submitted a Phase I Environmental Site Assessment which assessed the previous petroleum contamination and recommended mitigation controls. In consideration of the historical uses and associated environmental conditions, the proposed self-storage use is considered low risk and is an appropriate use for the site with some remediation required as identified and recommended in the Phase I Assessment.

Official Plan

The Official Plan does not permit self-storage facilities or indoor storage as standalone uses within any land use designation or zoning category. Instead, these uses are considered to be storage and warehousing (within the Industrial land use policies) of the Official Plan.

Planning staff note that a 'warehouse' is generally understood to be an industrial use where goods and merchandise are stored on a large scale and is associated with a considerable amount of truck movement and parking. Warehousing may also generate substantial amounts of noise and include outside storage. These types of operations may also be open on a 24/7 basis depending upon the type of goods being warehoused.

Having said this, considering that multi-unit residential uses are permitted within the surrounding area, permitting a traditional industrial use within this area could create compatibility issues whereby some lands may not be able to be developed for residential purposes without noise mitigation (if possible).

Conversely indoor personal storage facilities are generally used for the temporary storage of household items and personal items within enclosed storage areas/lockers on a smaller scale. They are uses that are accessible by means of a controlled access point, do not require large parking areas or generate substantial amounts of traffic, do not have associated outside storage and typically operate during normal daytime hours. Based on the foregoing, personal storage facilities are generally considered to be more commercially oriented as opposed to industrial in

nature and therefore more compatible with the types of uses typically associated with the Town's Service Commercial area by servicing the travelling public or nearby residential developments.

In light of the above and the property's location within the Town's Service Commercial area, Planning staff are of the opinion that it is reasonable to differentiate the proposed use (self-storage) from a warehouse to ensure a traditional warehouse operation cannot establish on the subject lands as of right in future thereby avoiding the creation of unwanted conflicts within the Service Commercial designation, and ensuring that larger warehousing developments remain concentrated in industrial areas.

With respect to compatibility, the indoor self-storage use is a low intensity land use that, as noted, does not generate significant noise, odour or significant traffic volumes. According to the applicants, the use will not be staffed and is anticipated to operate during regular daytime work/business hours. Given the intensity of use and anticipated traffic generated relative to other uses within the Service Commercial area, the impact of the proposed facility is anticipated to be negligible.

Town of Tillsonburg Zoning By-law

The subject lands are currently zoned 'Service Commercial Zone with a Holding Provision (SC)(H)', the applicant is requesting site-specific provisions within the 'Service Commercial Zone (SC)' to permit the proposed self-storage use, as well as a reduced landscaped open space requirement and no requirements for parking on-site.

Additionally, the subject lands currently have a holding provision in place which require the applicant to submit an environmental assessment when a development is proposed to ensure that lands identified as contaminated are remediated.

Although a self-storage or warehousing use is not permitted within the Service Commercial zone, as noted above, staff are satisfied that the proposed use has negligible impacts to surrounding land uses, minimal noise and traffic considerations and does provide a commercial type of use which serves the surrounding residents.

The purpose of the Holding Provision on the subject lands as outlined in Section 14.3.1 of the Zoning By-law is to ensure that lands identified as contaminated are remediated in accordance with the requirements of the Ministry of Environment, Conservation and Parks. The Holding Provision may be removed once MECP approval of the Record of Condition is received and the owner has entered into a site plan agreement with the Town. Permitted interim uses are existing uses, buildings and structures as the legally existed at the date of adoption of the Zoning By-law.

In this instance, Planning staff are satisfied that removing the Holding Provision to accommodate the proposed self-storage use is appropriate. A Phase I Environmental Site Assessment has been submitted with recommendations for remediation and further monitoring during the construction and excavation of the lands. As noted, a Record of Site Condition is not required by the Environmental Protection Act for the proposed self-storage use. If a more sensitive use is proposed in the future a Record of Site Condition may be required. Planning staff suggest that any remediation required as part of a new development on the property would be addressed through existing legislative requirements, and the Holding Provision is no longer required in this instance.

The applicant has requested that the minimum landscaped open space requirement be reduced from 15% to 9.5% to accommodate the proposed development. The intent of the landscaped open space requirement in the Service Commercial Zone is to ensure that developments provide buffering, screening and compatibility with nearby uses. The proposed concept shows the required planting strip surrounding the perimeter of the property and some grassed areas. The property currently is covered by gravel, and the proposed landscaping is a benefit for the subject lands surrounding neighbourhood. Staff are satisfied that the proposed landscaping can be assessed through site plan control and provides a net benefit to the area while still providing perimeter buffering and screening.

Additionally, the applicant is requesting relief from the off-street parking requirement. Typically, self-storage uses are considered a warehousing type of use. As per Table 5.24.2.1 a warehouse requires 1 parking space per 200 m² (2,152 ft²) of gross floor area, if this parking ratio were applied 5 parking space would be required. The applicant has indicated that there will be no full time staff on the subject lands and the office for the self-storage business will be located at an abutting property (127 Tillson Avenue) also owned by the applicant. Due to the nature of the business being a storage drop-off type of use, defined parking spaces are not required for customers as they will typically drive to their assigned storage unit. As such, staff are satisfied that the requested parking ratio of zero spaces is appropriate as staff are not working from the subject site and the type of business does not warrant a formal parking arrangement.

In light of the foregoing, Planning staff are satisfied that the proposed development is generally consistent with the policies of the Provincial Planning Statement and meets the general intent and purpose of the Official Plan respecting uses in service commercial areas.

RECOMMENDATIONS

That the Council of the Town of Tillsonburg advise County Council that the Town supports the application to amend the Official Plan (File No. OP 26-01-7), submitted by 2780480 Ontario Inc. for lands legally described as Lots 417, 418 and 419, Plan 500, in the Town of Tillsonburg to facilitate the establishment of a self-storage business on the subject lands;

That the Council of the Town of Tillsonburg approve in principle the zone change application (File No. ZN 7-26-01) submitted by 2780480 Ontario Inc. for lands legally described as Lots 417, 418 and 419, Plan 500, in the Town of Tillsonburg, to rezone the lands to ‘Special Service Commercial (SC-sp)’ to permit the self-storage business with site-specific provisions.

SIGNATURES

Authored by: *Original signed by*

Amy Hartley
Development Planner

Approved for submission: *Original signed by*

Eric Gilbert, MCIP, RPP
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