

2025-10-22

Via Online Submission

Ministry of Municipal Affairs and Housing
Municipal Services Office – Central Ontario (Priority Projects)
12th Floor, 777 Bay St.
Toronto, ON M7A 2J3

RE: ERO Consultation No. 025-1108 Regarding 1875 Steeles Avenue West

Dear Ministry:

I am writing on behalf of Microbjo Properties Inc., the owner and operator of the apartment building and property at 1875 Steeles Ave. W. in Toronto. Tenblock is Microbjo's development management entity.

We have spent over 5 years and \$5-million in good faith, seeking government permission to build 132 affordable apartments and 828 market-rate apartments at our property.

You have asked for input on whether you should consider the request from MEDJCT to make a Minister's Zoning Order (MZO) on our property, limiting maximum height to 33 metres.

If you grant the requested MZO, it will kill the project, block new homes for 960 households, squander our invested capital and effort, and meaningfully undermine our and the housing industry's business confidence.

We object in the strongest possible terms and ask you to **refuse the MZO request**.

Our Business

Since the 1950s, our family business has developed and operated rental apartment buildings in Toronto, the GTA, and Southwestern Ontario. Thousands of Ontario households call our buildings home, and we work hard to be a good landlord and developer.

In 2019 we made a strategic business decision to reinvest in our portfolio, aiming to add thousands of new apartments in locations where policy supports intensification, such as at 1875 Steeles Ave. W.

Our Proposal

We have proven that our housing proposal satisfies all known requirements and should be allowed by Ontario's land use planning system. This conclusion has been tested and confirmed by the municipality's professional staff and independent peer reviewers. We are not aware of any substantiated technical or planning objections to our proposal that remain unaddressed. The record is well established in this regard and I will not restate the details in this letter.



Sanofi

We respect our neighbour Sanofi's role as a life sciences employer and industrial facility. Our existing apartment building and Sanofi have harmoniously co-existed near each other for over 50 years.

Sanofi objects to our housing proposal and has lobbied the provincial government to use its Ministerial powers to place arbitrary restrictions on our private property. Sanofi has not provided any specific evidence or technical analysis to support its assertion that new housing threatens its operations.

The MZO request is not justified and therefore should be refused.

Fairness

Housing development in Ontario is expensive, slow, and vulnerable to risks including labour and material costs, red tape, financial markets, supply and demand, and site conditions. The development market is currently very weak and many housing projects and developers are at serious risk of failure.

Despite these challenges, we have continued investing in new housing projects because we have confidence that in Ontario, if we satisfy the requirements, government will eventually allow us to build new homes on our property. Your recent and ongoing land use planning reforms have strengthened our confidence that you are committed to making Ontario a fair and reliable place to invest.

However, granting the MZO request would signal to us and other developers that Ontario's land use planning system is not evidence-based and is always at risk of arbitrary intervention. This would shake business confidence and undermine housing production at an already perilous time for our industry.

Resolution

Although we do not appreciate the extensive delays to our housing development, we remain committed to finding a mutually acceptable resolution. If any substantiated concerns exist, we are open to hearing them and finding creative solutions including modifying our project to address them.

Your Ministry is uniquely placed to convene the parties into a substantive discussion and resolution. We suggest utilizing the Provincial Land and Development Facilitator (OPLDF) but will engage with any method you suggest to resolve this situation in a fair and evidence-based manner.

Yours very truly,

Tenblock

Stephen Job, AICP
Vice President