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November 1, 2025

Minister Rob Flack
Ministry of Municipal Affairs and Housing
17th Floor
777 Bay St.
Toronto, ON
M7A 2J3

RE: ERO number 025-1109 - Request for a Minister's Zoning Order (MZO) to restrict building heights to protect a biomanufacturing campus in the City of Toronto

Minister Flack :

Volunteers from our HousingNowTO.com civic-tech and open-data project have been in active conversations with our Federal Government partners about the large federally-owned surface parking lot lands at **4905 DUFFERIN AVE** as part of their new “Public Lands for Homes” program as announced in [Canada's Housing Plan](#) and Budget 2024.

As we expressed to [Toronto City Council last year](#), we have serious concerns about how the exclusionary height limits requested by Sanofi would have a deeply negative impact on future area residential development and effectively kill any opportunity to redevelop any of the 5+ acres of federally-owned surface parking lots on the south-east corner of Dufferin Street and Gerry Fitzgerald Drive, and any new affordable housing opportunities a potential redevelopment would provide to the City of Toronto and the new federal Build Canada Homes agency.

Therefore, our HNTD affordable housing volunteers request that the MZO under consideration does not proceed and that an impartial mediation process be initiated to establish, interrogate and validate the specific security concerns of Sanofi. Some of our volunteers have experience in commonwealth government building security standards in the UK and Canada – and believe Sanofi's stated “national security concerns” to be specious, not based in fact, and broadly over-reaching any legitimate security issues for a pharma facility in an urban centre.

Any legitimate concerns about overlook or proximity, could be addressed via normal building design and site plan processes (eg. screens and walls on Sanofi property, etc). Any land-use

changes should involve all the landowners within Sanofi's area of concern, in order to reach a thoughtful and comprehensive solution that ensures all public entities and area institutions can successfully plan for future affordable housing, student housing, and residential growth on the west side of the ravine.

Please do not proceed with the drafted MZO at this time, as we believe the request will be broadly damaging to the stated goals of the provincial-target of creating 285,000 new homes within the borders of the City of Toronto.

We have attached a series of planning-maps and photographs on the following pages that highlight our areas of concern in relation to the Sanofi plant, as an appendix to this letter. As always, our open data and civic-tech volunteers are happy to respond to any questions that your MMAH team may have about this ERO submission.

Yours,

A handwritten signature in black ink, appearing to read 'Mark Richardson', with a horizontal line drawn underneath it.

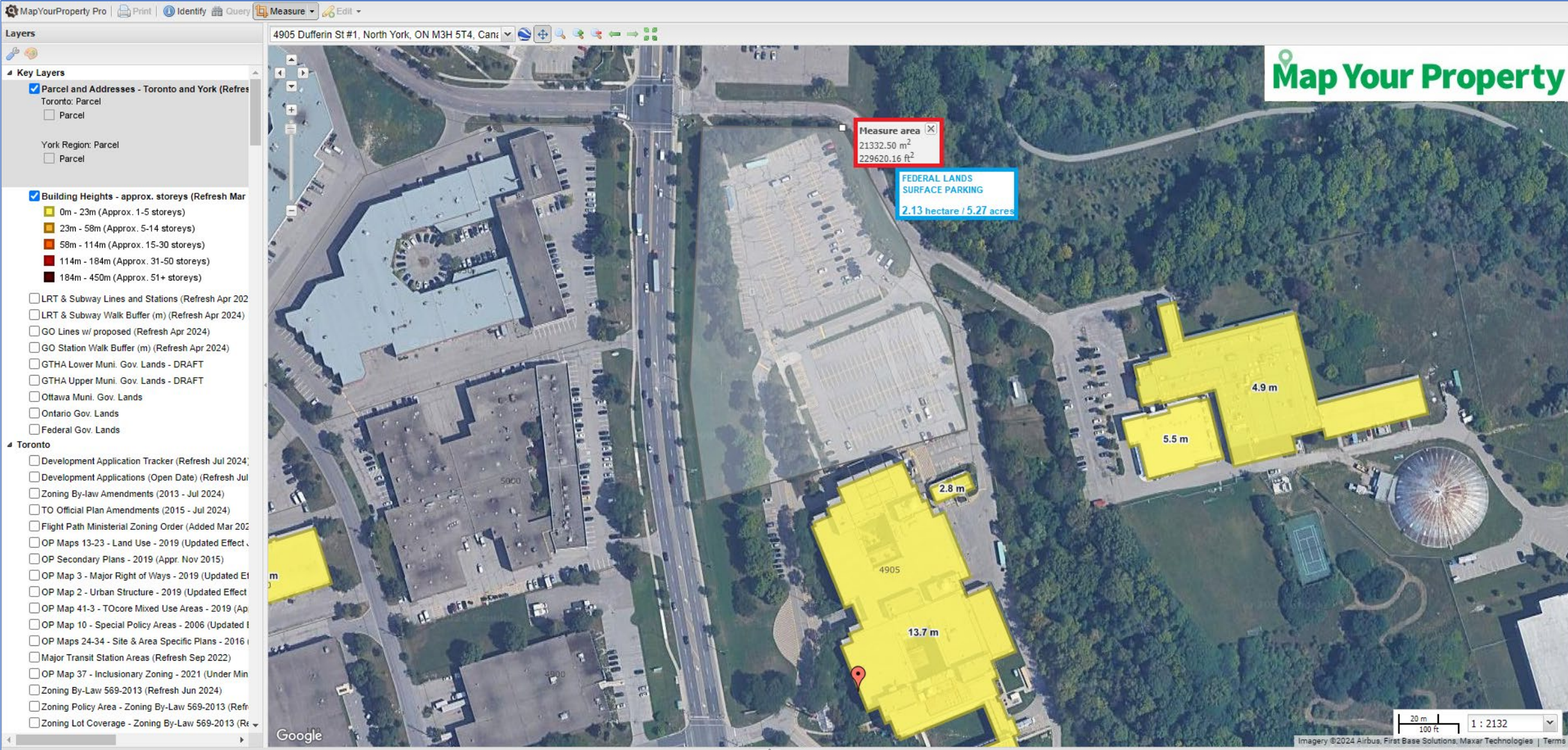
Mark J. Richardson
Technical Lead – HousingNowTO.com

CC –

- *Toronto Mayor Olivia Chow*
- *Toronto Councillor James Pasternak*
- *Chief Planner - City of Toronto*
- *David Sit, Director, Community Planning - North York District*

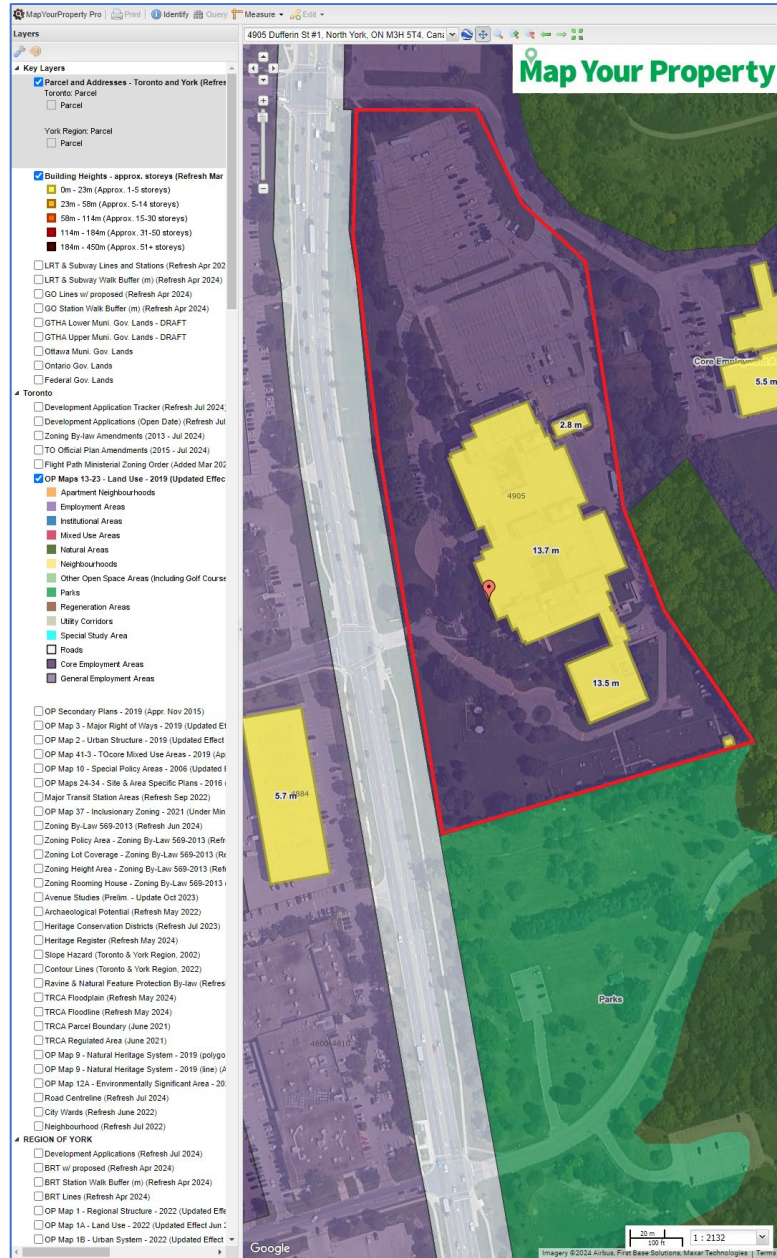


APPENDIX 'A' – Federally-Owned Surface Parking Lot at 4905 DUFFERIN ST (2.13 hectares / 5.27 acres)





APPENDIX 'B' – Federally-Owned Surface Parking Lot at 4905 DUFFERIN ST (2.13 hectares / 5.27 acres of undeveloped lands to the north of the Environment Canada Offices)





APPENDIX 'B' – Federally-Owned Surface Parking Lot at 4905 DUFFERIN ST (location as related to SANOFI lands to the east, across the ravine)

