



Mayor and Members of Council  
City Hall  
100 Queen St. W.  
Toronto, ON  
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November 12, 2025

RE: Item 2025.MM34.11

Sanofi Pasteur Limited makes this submission in support of Councillor Pasternak's motion to support the proposed Minister's Zoning Order to protect the operational viability of its operations at 1755 Steeles Ave W (the "Sanofi Site").

### *Summary*

The Sanofi Site is home to Canada's largest biomanufacturing and R&D facility, operating near Dufferin Street and Steeles Avenue West for more than 110 years. More than 2,000 people work at our campus, delivering critical public health operations for Canadians and around the globe. Our teams are part of the community, supporting local economic activity and working to foster a long-term, sustainable life sciences ecosystem as part of a thriving neighbourhood.

Sanofi understands the need to address the demand for housing in the region, but addressing this need must not be at the expense of our ability to effectively deliver critical public health operations and operate as one of the City's most significant employers. With millions of dollars of federal, provincial and municipal government investments in the Site to advance public health, there are no other operations like Sanofi in Canada, and our ability to operate and expand must not be disrupted to enable the building of new housing in such close proximity.

Sanofi supports the request for the MZO which will limit the scope and scale of development immediately adjacent to our industrial facility; this will have the effect of safeguarding our continued operations. We respectfully request the City for its support of the MZO. As City Council has already decided to oppose the re-zoning of the Tenblock property, support for the MZO would be consistent with that prior decision.

Sanofi operates a large, industrial site 24 hours a day, 7 days a week, 365 days a year, meeting Canadian and global demand for lifesaving vaccines in support of advancing critical public health mandates. Sanofi must continue to have the ability to both operate and expand to deliver new medicines and vaccines. The proposed addition of 960 new residences within 115 metres may compromise the viability of ongoing production and future expansion and development potential on our Sanofi Site. The proposed MZO, with a development height not exceeding 33 metres, would be acceptable to Sanofi as it will mitigate the potential effects of new sensitive uses so close to our Site.

Sanofi has studied the potential noise effects of Sanofi's operation on the proposed adjacent residential development and has confirmed that the noise from Sanofi's operations will exceed provincial guidelines. Tenblock's own studies confirm this.



Sanofi's operations also come with unique limitations resulting from the sensitive and confidential nature of both its research as well as its manufacturing. Residences at heights above 33 metres would pose a risk to the security of the Sanofi Site and its sensitive operations. It would also result in potential limitations on Sanofi's ability to obtain future mandates for sensitive projects, limiting further expansion of the positive economic impact on the city, province, and country as well as the domestic biomanufacturing footprint.

The proposed MZO is consistent with the purposes of the Planning Act, and is an appropriate use of the Minister's discretion to ensure that the significant public investments in research and manufacturing on the site are protected.

### *Context*

The Sanofi property, where there have been operations for more than 110 years, is home to the largest vaccine manufacturing and research and development facility in Canada and plays a critical role in public health security.

The importance of our operations is reflected in the recent significant (\$540 million) investments from the Government of Canada and the Province of Ontario as well as collaboration with the City of Toronto, to provide expanded domestic vaccine production and pandemic readiness for Canada and beyond. On May 30, 2024, former Prime Minister Trudeau, Premier Ford and Mayor Chow were all in attendance at the Sanofi Site to attend the opening of Canada's largest biomanufacturing facility, one of the new buildings on the Site.

The most recent investments by all levels of government will result in an influenza vaccine manufacturing facility on the Sanofi Site, which will also have the capacity to produce enough pandemic influenza vaccine doses to protect all Canadians.

Sanofi is critical to Canada and Ontario's life sciences and biomanufacturing sector. It currently provides employment for over 2,000 workers, almost 80% of which are related to vaccines.

Sanofi estimates that in 2024 alone, it contributed over 2 billion dollars to Canada's GDP, through direct, indirect and induced effects.

The importance of Sanofi's operations, and of the investment of public funds at this site, is reflected in the attached letter from Health Emergency Readiness Canada, which acknowledges the "criticality of maintaining the domestic ability to produce essential products such as the vaccines that Sanofi produces on its campus as part of our national health security posture".

### *Engagement with Tenblock*

Sanofi has met on numerous occasions with Tenblock to communicate our concerns with respect to the proposed development next to the Sanofi Site. Sanofi has responded to each request from the adjacent developers to meet and discuss questions and our position. While under no obligation to do so, Sanofi agreed (subject to a non-disclosure agreement) to release confidential and proprietary information regarding both noise and air emissions in order to allow for independent assessment of noise and air quality issues to be undertaken. As set out in more detail below, the noise engineers for Tenblock and



the City's peer reviewer concluded that provincial noise guidelines cannot be met if the Tenblock development is built at a height of greater than 40 metres.

*The MZO conforms with the purposes of the Planning Act, and protects provincial interests*

The approval of an MZO to protect the viability of Sanofi's operations falls squarely within the purposes of the Planning Act, contained in section 1.1. By protecting the viability of Sanofi's operations, sustainable economic development<sup>1</sup> is promoted in a manner that integrates the province's interest<sup>2</sup> into decision making in a manner that is led by provincial policy.<sup>3</sup> The provincial interest in determining the appropriate location of growth and development<sup>4</sup>, protecting public health and safety<sup>5</sup> while protecting the financial and economic wellbeing of the province is also protected.<sup>6</sup>

Economic development is central to the province's regulation of land use planning. Ontario has also made a clear commitment to the development of the life sciences sector, as part of its life sciences strategy "Taking Life Sciences to the Next Level".

*The MZO is consistent with the Provincial Planning Statement*

While ministerial decisions to enact a zoning order are expressly exempt from the requirement to be consistent with the Provincial Planning Statement, 2024, the proposed MZO is in fact consistent with the PPS.

The PPS 2024 provides additional acknowledgement of the importance of the long-term economic viability of employment when new residential development is proposed within 300 metres. Policy 2.8.1.3 expressly requires that new development must avoid, or where avoidance is not possible, minimize or mitigate potential impacts on the long-term economic viability of adjacent employment uses. Limiting the height of adjacent residential development does not entirely avoid the potential for impacts on Sanofi's operations – however it does mitigate such impacts. By limiting the height of new residences, the amount of overlook of Sanofi's operations is limited, and the exceedances of provincial noise guidelines will be minimized.

Policy 3.5.1 also requires that new sensitive land uses are to be designed to ensure the long-term economic viability of major facilities. Potential adverse effects from noise are also to be avoided in accordance with provincial noise guidelines. As set out in more detail below, limiting the height of residential development as proposed by the MZO will mitigate the potential effect of noise from Sanofi's operations on any new residential development.

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<sup>1</sup> *Planning Act section 1.1 (a)*

<sup>2</sup> Para. 1.1.(c)

<sup>3</sup> Para 1.1.(b)

<sup>4</sup> Para 2 (p)

<sup>5</sup> Para 2 (o)

<sup>6</sup> Section 2 (l)



### *Land use compatibility*

The PPS 2024, as well as the long standing D Series Land Use Compatibility Guidelines, recognize the importance of compatibility between sensitive uses and major facilities. The Planning Act itself also recognizes the importance of ensuring that facilities that have the necessary approvals under the Environmental Protection Act have the ability to protect their ongoing operations. The recent prohibition on third party appeals to the Ontario Land Tribunal does not apply to holders of environmental compliance approvals where land use compatibility issues may arise within 300 metres of their properties.

As a 24/7 operation, Sanofi's facilities are considered a Class III industry for the purposes of the D-6 Guidelines. Those guidelines recommend a 300 metre separation distance between such facilities and new sensitive uses – with the onus being on the proposed new sensitive use to demonstrate compatibility. Given that the provincial guidelines on noise cannot be met, compatibility has not been demonstrated.

Sanofi's property is designated as Core Employment in the Official Plan, and was previously part of the Toronto-York Provincially Significant Employment Zone. In 2012, the City approved an Official Plan Amendment and zoning by-law amendment to permit the expansion of Sanofi's operations, converting land from a Neighbourhood designation to Employment Area.

When Sanofi applied to the City of Toronto to re-designate and re-zone the southern portion on the Sanofi Site to allow expansion, restrictions were included in the zoning that reflected the setbacks recommended in the D-6 Guidelines based on the existing residential uses. The same approach should be applied here – limiting sensitive uses near the existing and expanding Sanofi operations.

### *Noise*

The technical work completed by Tenblock's noise consultants concluded that the Class 1 noise level limits are exceeded between 11 p.m. and 7 a.m. at the proposed residences, and that mitigating the noise from Sanofi to meet the Class 1 limits "is not practical." Tenblock's Stationary Noise Assessment report confirms that Class 1 limits are exceeded at all heights greater than 40 m, but did not model sound levels at less than 40 m.

Sanofi has commissioned a review by Dillon Consulting (attached) which confirms that the proposed residential towers in close proximity to the Sanofi Site will result in a significant land use conflict. This will limit Sanofi's ability to operate in compliance with our regulatory approvals, and to expand operations in the future.

The proposed solution from the developer is to designate its property as a Class 4 site for the purposes of NPC-300, which would result in permitting up to 10 dba louder noise.

Designating the site as Class 4 is not a noise mitigation measure. A Class 4 designation changes the standards and allows louder noises – it does not decrease the noise in any way. A Class 4 designation also does not mean that new residents cannot file complaints. Sanofi anticipates that the addition of 960 units (representing several thousand new residents) will result in a significant increase in noise complaints and the diversion of



resources to respond to them. As set out in the Dillon review, additional residents so close to Sanofi's operations results in an increase in potential annoyance and increased complaints.

Sanofi has no doubt that a Class 4 designation and increased residents would result in increased complaints, and any warning clauses or other agreements do not and cannot mitigate that risk to Sanofi. Responding to complaints diverts resources from our operations and has historically slowed permitting approvals, which has hindered our expansion operations. It also creates an environment whereby future investments in the Sanofi Site are less likely, harming Ontario and Canada's competitiveness for high quality jobs in the biotechnology field. Sanofi's Site must be able to advance and expand at the speed of science to remain globally competitive.

### *Security*

Sanofi is particularly concerned about the security of its sensitive operations. The research and manufacturing of biopharmaceuticals and vaccines is frequently the subject of scrutiny, opposition and protest. Its existing operations take this into consideration through the use of measures to protect information about its day-to-day operations. The location of hundreds of new residential units with a 24/7 overlook of its sensitive facilities undermines Sanofi's ability to ensure our ongoing and expanding vaccine research and manufacturing facilities are secure, given the strategic importance of the Sanofi Site, nationally and globally, for vaccine manufacturing and future pandemic readiness.

Given Sanofi's security risk profile (the nature and details of which of necessity must remain confidential), we continue to have fundamental concerns with the increased risk posed by the proposed development.

These concerns relate not just to the potential for observation of our actual development and manufacturing operations, which take place inside, but to the gathering of information about our operations, vendors, practices, and employees generally. The enhanced platform for oversight of our facility provided by the proposed tall buildings greatly increases the risk to our operations.

The potential for oversight is demonstrated by the attached viewsheds, which show the perspective of a view over the Sanofi Site from a height of 10 storeys (33 metres) and 37 storeys (122 metres).

On this issue in particular, Sanofi is strongly opposed to the increased risk to the security of all aspects of our operations if there is development at heights greater than 33 metres adjacent to our operations.

We have reviewed the work carried out by Tenblock's security consultant Juno Consulting, including its analysis of other sites that they view as being comparable. We respectfully disagree with this assessment. The characterization of the Sanofi Site as surrounded by "... tall residential complexes with commanding views of the Sanofi campus" is not accurate. There is no building within 500 metres of the Sanofi Site taller than 8 storeys. Placing a 37 storey building immediately adjacent to Sanofi's Site is not comparable; the proposed location and height clearly increases the oversight and risk to the security of Sanofi's operations.



Juno draws particular attention to the recent approval of a 27 storey residential building adjacent to a National Research Council campus, as well as the CSIS and CSE headquarters. We note that the NRC site has not implemented physical security measures around the site, making it a poor comparator. All of the roads are open to the public, and the interior of the site is viewable on Google Street View. The CSIS headquarters is close to a kilometre away, and the CSE building even further. By contrast, the Sanofi Site is physically secured through perimeter security, cannot be viewed on Street View, and the proposed buildings are approximately 115 metres away.

Juno's report also highlights the opening of Sanofi's buildings in Cambridge, Massachusetts in close proximity to existing residential development. With respect, there is no comparison between the decision to build a new complex with full knowledge of the threat environment, and planning accordingly, and having the environment surrounding a site that has operated in a low density environment for a century fundamentally changing. Manufacturing and research operations conducted at our Sanofi Site involve more complex, sensitive activities that do not compare with the impact of our offices in Cambridge, Massachusetts.

#### *Site Services*

As part of Sanofi's expanded operations, we have been required by the City of Toronto to be responsible for the design and construction of new water infrastructure, including a 400 mm new watermain in Steeles Avenue, and an increase in the size of the existing watermain for the area. Sanofi has posted a \$2,500,000 letter of credit with the City to secure the construction of these works, which will be increased by a further \$2,000,000. These works were required by a Municipal Infrastructure Agreement entered into between Sanofi and the City as a condition of the approval of the construction of our recently expanded facilities which also demonstrates our commitment to contribution to the local infrastructure.

#### *Future operations*

As set out above, the PPS 2024 expressly speaks not only to existing operations of major facilities, it also protects the long-term viability of such operations. If the MZO is not in place, and new high rise residential uses are approved and built adjacent to our operations, Sanofi's ability to expand operations on the existing campus will be limited by the presence of the sensitive uses. While Sanofi is currently adjacent to low density residential uses, sensitive uses in towers create noise receptors at height, which creates a more limited ability to increase production capacity, or compete globally for new R&D and biomanufacturing mandates in the future. Many countries are actively pursuing biomanufacturing facilities within their borders, and any limiting factors (such as adjacent high rise residential) decreases the potential for new investment at this site.

#### *Conclusion*

Sanofi is a key contributor to Ontario and Canada's life sciences sector. It has partnered with all levels of government to respond to the need for timely delivery of vaccines for all Canadians. Our ability to continue to expand and contribute high quality jobs will be limited if the Sanofi Site is surrounded by high density development.

Sanofi has carefully considered the implications of all the proposed residential developments in proximity to our site. Sanofi is firmly of the view that its Site's



contribution to public health and pandemic preparedness, and its ability to sustain current, and attract future, R&D and biomanufacturing mandates, jobs and investments to Ontario cannot be compromised by the constraints that will result from the scale and scope of the proposed residential developments.

Putting in place an MZO that limits the potential heights adjacent to the Sanofi Site is an appropriate exercise of the Minister's discretion under the Planning Act. It falls squarely within the purposes of the Act, in particular the promotion of sustainable economic development.

We ask that the City endorse the request for an MZO, which will provide certainty to all stakeholders, and would be consistent with City Council's opposition to the re-zoning of the Tenblock site in July, 2024.

Sincerely,

A handwritten signature in blue ink that reads "Kate Winchester".

Kate Winchester  
Head of Manufacturing and Supply Canada, and Toronto Site Head



September 25, 2025

James Guy, General Manager Specialty Care and Country Lead Canada  
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## **Letter of recognition of Sanofi's importance to Canada**

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Dear Mr. Guy,

I am the Interim Head of Health Emergency Readiness Canada (HERC), a new special operating agency within the Government of Canada focused on supporting domestic industrial capabilities to develop and produce vaccines, therapeutics, and diagnostic tools, as well as growing the Canadian life sciences and biomanufacturing ecosystem.

HERC recognizes the importance of Sanofi Pasteur as one of the largest vaccine manufacturers worldwide and a major contributor to Canada's life sciences sector. The North York site produces vaccines that are important for protecting and saving lives in Canada and globally. The facility is also one of the largest employers in the Canadian sector, supports domestic biopharmaceutical research and development, and maintains and builds upon the tradition of a historically important research campus that is over 100 years old.

As you know, the Government of Canada supported Sanofi with a contribution of \$415 million through the Strategic Innovation Fund toward the construction of the new FLUZONE facility. HERC has been closely following the progress of the FLUZONE project and looks forward to its completion, which will increase Canada's capacity to produce essential influenza vaccines that can improve health outcomes for Canadians and others around the world. This project contributes to HERC's goal under the Government of Canada's Biomanufacturing and Life Science Strategy to strengthen Canada's vaccine manufacturing capabilities – a goal which will serve to advance national health security objectives. Developing domestic capabilities like these is critical for protecting the health, well-being, and security of our population.

In addition, through the Federal Economic Development Agency for Southern Ontario, the Government of Canada made a \$20 million contribution toward the new B100 facility to expand its diphtheria-tetanus-pertussis vaccine production capacity. The significance of this project was marked by the attendance of former Prime Minister Justin Trudeau at its opening in 2024.



The Government of Canada acknowledges and greatly appreciates the investments of money and effort that Sanofi has put forward to realize the new manufacturing facilities on its Toronto campus. These investments will contribute to Canada's economic growth, create good jobs, and reinforce Canada's biomanufacturing capacity. Increasingly, we recognize the criticality of maintaining the domestic ability to produce essential products such as the vaccines that Sanofi produces on its campus as part of our national health security posture.

As HERC continues to promote life science excellence and strengthen health security for Canadians, we look forward to advancing our work with anchor firms such as Sanofi to support the growth of strong national and regional life science ecosystems within Canada.

Sincerely,

**Banerjee,** Digitally signed by  
Banerjee, Ritu  
**Ritu** Date: 2025.09.25  
22:21:38 -04'00'

Ritu Banerjee  
Interim Head  
Health Emergency Readiness Canada



November 12, 2025

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### ***Sanofi Noise Assessment – Proposed New Residential Development***

Dillon has carried out a Noise Assessment (Sanofi Noise Assessment – Proposed New Residential Development) to evaluate the noise compliance of Sanofi's existing and planned future expansions in the context of several proposed high-density residential developments northwest and west of the Sanofi Campus.

While the assessment is based on detailed quantitative noise modeling, its conclusions point to a significant and likely unresolvable land-use conflict. The technical data confirms that the introduction of these high-rise developments creates an untenable situation for both future residents and the long-term viability of Sanofi's operations.

#### **1. Summary of Findings**

The assessment's primary conclusion is that even after Sanofi implements significant mitigation measures for its own planned expansions, the introduction of the new high-rise residential towers will result in noise levels that exceed the 45 dBA nighttime MECP limit.

This technical failing has two critical qualitative consequences:

- **For Future Residents:** This is not a minor nuisance. The facility's noise sources are "steady", meaning residents can experience chronic sleep disturbance from constant and inevitable noise emissions from the facility, resulting in an increase in a highly annoyed population (per Guidance for Evaluating Human Health Impacts in Environmental Noise, 2017). This will lead to a high number of noise complaints against the Sanofi Campus, likely creating an adversarial relationship between the Sanofi Campus and future residences of the development.
- **For Sanofi:** The assessment concludes that mitigating noise for the higher floors of these towers, above 10 storeys, may not be technically feasible. This may place Sanofi in an impossible position: They will be held responsible for noise compliance at receptors that are fundamentally impractical to protect,



exposing the facility to constant regulatory pressure for a problem they did not create nor were able to control.

## 2. Direct Conflict with Provincial Planning Statement (PPS), 2024

The scenario detailed in the assessment is in direct conflict with Ontario's Provincial Planning Statement (PPS), 2024, which mandates that all planning decisions shall be consistent with its policies.

The PPS, under **Section 3.5 (Land Use Compatibility)**, provides non-negotiable direction for this exact situation.

*3.5.1 - Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to **ensure the long-term operational and economic viability of major facilities** in accordance with provincial guidelines, standards and procedures.*

*3.5.2 - Where avoidance is not possible in accordance with policy 3.5.1, **planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other major facilities that are vulnerable to encroachment by ensuring that the planning and development of proposed adjacent sensitive land uses is only permitted if potential adverse affects to the proposed sensitive land use are minimized and mitigated**, and potential impacts to industrial, manufacturing or other major facilities are minimized and mitigated in accordance with provincial guidelines, standards and procedures.*

The assessment's primary conclusion—that mitigation for the proposed high-rises may not be technically feasible—demonstrates that the developer *cannot* meet this provincial mandate. This is not a problem that can be resolved with minor adjustments. The intent of the PPS is to protect for land use incompatibility.



We trust this assessment and its conclusions provide the necessary evidence to address this critical planning conflict.

Please don't hesitate to contact the undersigned with any questions.

Sincerely,

**DILLON CONSULTING LIMITED**

Lucas Arnold, P.Eng.  
Associate

Shayne Giles  
President



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