



December 20, 2022

Provincial Land Use Plans Branch
13th Flr, 777 Bay St
Toronto, ON
M7A 2J3
Canada

Re: ERO Number: 019-6177
Review of A Place to Grow and Provincial Policy Statement

I write with respect to the consultation regarding the proposed integration of the Provincial Policy Statement and A Place to Grow as part of the Housing Supply Action Plan. Sanofi is supportive of the Plan's goal of bringing housing to market to address the shortage of affordable housing in the province. However, this initiative must be implemented in the context of other important provincial priorities, including the protection of the investments that all levels of government have made in pandemic preparedness and vaccine manufacturing capacity.

Summary

Sanofi has reviewed the Provincial Policy Statement and A Place to Grow and considered how those documents might be integrated in a way that protects the investments that have been made in vaccine manufacturing and capacity. A number of policy and legislative changes are suggested, and set out in more detail, below.

Background

Sanofi is the owner of 1755 Steeles Ave W, Toronto, where it operates a large biopharmaceutical manufacturing and research campus, which is located in a Provincially Significant Employment Zone. Sanofi is in the process of expanding its facilities to include vital, and national and globally important vaccine manufacturing capacity, including pandemic preparedness. This expansion is the result of a significant investment by all three levels of government.

The Sanofi facility is approximately 21 ha in size, and comprises over forty buildings. Medical and biopharmaceutical research and manufacturing have been located here for over 100 years, and has been home to many significant innovations for global public health mandates. It is located in an area that is experiencing significant growth pressure, with 3 proposals in the immediate vicinity that propose thousands of new residents in close proximity to our facility.

Sanofi is supportive of the government's overall initiative to bring affordable and attainable housing to market to address the current housing crisis. However, this goal cannot be achieved at the expense of existing industry and jobs. Sanofi is concerned about the potential impact of encroaching development not only on its existing facility, but also on its ability to expand in



the future in order respond to new health and vaccine mandates. This is not hypothetical, as there are currently two Planning Act applications being considered by the City of Toronto seeking approval of 4 towers, ranging in height from 27-39 storeys, with podiums from 10-12 storeys immediately adjacent to our facilities. A third proposal is contemplated, but applications have not yet been filed. If approved, this will introduce thousands of residents at a height and in a location that could limit Sanofi's ability to develop and expand its operations in the future.

While the sites are located within the 400-407 Provincially Significant Employment Zone (as are Sanofi's facilities), the proposed development is on land that is designated Mixed Use in the Toronto Official Plan. The existing policies that apply to PSEZs currently only provide protection against conversion of PSEZ lands to non-employment uses. Because these lands allow some form of residential uses, the existing PSEZ policy framework offers no protection to Sanofi's facilities.

Sanofi recommends that the integrated provincial policies provide for clear protection within PSEZs not only against conversion to non-employment uses, but also for protection of existing facilities against the introduction of uses that could limit the ability to not only operate but also to expand in the future.

The existing policies in the Provincial Policy Statement that relate to land use compatibility¹ also need to be strengthened, as they only protect "...long term operational and economic viability". Mere viability is not an appropriate threshold for any provincially significant industries. The ability to not just continue to operate but also to expand is critical. This is even more important for Sanofi, which provides not just critical jobs, but also critical health infrastructure, giving Ontario and Canada the ability to respond domestically to current and future public health crises through vaccine research and biomanufacturing capabilities.

It is in this context that Sanofi recommends the following policy changes, which reflect (in part) the existing provincial policies which protect existing transportation and infrastructure corridors.²

Proposed Policy within new Provincial Policy Statement

Definitions:

Major facilities: Add "health infrastructure/bio-technology/vaccine manufacturing" to the list of uses to ensure that they are expressly included when considering land use compatibility issues.

¹ Policies 1.2.6.1 and 1.2.6.2

² Policy 1.6.8 – PPS 2020



Policies for Provincially significant employment zones

The policy description of PSEZs should expressly include reference to bio-technology/vaccine manufacturing facilities

Proposed specific policy language:

Employment within *provincially significant employment zones* shall be protected for the long term, including potential expansion of existing *major facilities*.

Planning authorities shall not permit *development* in or on *adjacent lands* to *provincially significant employment zones* that could preclude or negatively affect the operations and any potential expansion of existing *major facilities*. [Note: this policy could also be drafted to apply specifically to bio-technology/vaccine manufacturing facilities]

While this consultation is directed towards the integration of the PPS and A Place to Grow, Sanofi also recommends that as the province continues to review the *Planning Act*, consideration should be given to amending the list of provincial interests in section 2 to expressly include the provincial interest in the protection of health infrastructure within Provincially Significant Employment zones. Express reference could also be made to the protection of vaccine manufacturing facilities.

Sanofi has worked closely with all levels of government to advance Ontario and Canada's ability to respond to future public health emergencies and to provide vaccine manufacturing capabilities that have global reach. It is critical that these efforts, and the considerable public investment in these facilities not be jeopardized through the introduction of residential towers immediately adjacent to them. Updated provincial policies that make clear the importance of the protection of not only these facilities but also other important industries in provincially significant employment zones are an important part of protecting these facilities.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink that reads "Fabien Marino". The signature is written in a cursive, flowing style.

Fabien Marino
Vice President, Industrial Affairs and Site Head, Canada
Sanofi Pasteur Limited