



July 14, 2023

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

Re: ERO Number: 019-6813
Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement

I write with respect to the consultation on proposed policies for an integrated province-wide land use planning policy document. Sanofi Pasteur Limited also made submissions dated December 20, 2022, regarding the proposed integration of provincial planning policy documents. A copy of that submission is attached for reference. Sanofi continues to be of the view that the important goal of streamlining policy approvals in order to bring needed housing to market must not be at the expense of existing public investments in pandemic preparedness and vaccine manufacturing capacity.

Summary

Sanofi has reviewed the proposed Provincial Planning Statement (PPS), and has a number of suggestions as to how it might be modified from the existing proposed wording to better protect existing industries in general as well as the investments made by all levels of government in Sanofi's facilities. In particular, Sanofi recommends that Provincially Significant Employment Zones continue to be in place in areas of particular importance, and that policies be included that protect employers in such zones from encroaching residential development and ensure long term expansion potential in such zones.

Background

Sanofi Pasteur Limited is the owner of 1755 Steeles Ave W, Toronto, where it operates a large biopharmaceutical manufacturing and research campus, which is currently located in the 400-407 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 it 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 continues to be 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 its 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 expand its operations in the future. While Sanofi's facilities are currently adjacent to a low-rise residential neighbourhood, the introduction of thousands of new residents at increased heights has the potential to cause land use compatibility issues.

Policy Review

The proposed PPS does not contain any recognition of PSEZs and as such, contains no policies that protect these zones. Sanofi is not supportive of the proposed elimination of PSEZs from the planning policy regime. As set out in our earlier submission, PSEZs can be important policy tools to ensure that existing and significant employment areas are not only protected from conversion to residential uses, but are also protected against encroachment of neighbouring residential uses.

The proposed policy changes to the land use compatibility policies also have the potential effect of potentially making it easier for sensitive land uses to be introduced adjacent to, or in the vicinity of, major facilities. The existing provincial policies¹ require a demonstration of a need for a proposed sensitive use, that alternative locations be considered, and make express reference to the potential for adverse effects (a term defined in the *Environmental Protection Act*). These tests are not proposed to be incorporated into the new PPS. Rather, a test which refers to "potential impacts"² (as opposed to adverse effects) being minimized and mitigated is proposed. This policy, as currently proposed, would permit sensitive land uses adjacent to existing facilities where impacts could occur, provided they are "minimized and mitigated". This policy approach offers little to no protection to industries that may seek to expand in the future, where the presence of new sensitive uses could limit the ability to increase production or introduce new noise or emission sources.

As with our previous submission, Sanofi continues to be of the view that industries (particularly those in the bio-technology/vaccine manufacturing field) must be protected for the long term. In Sanofi's particular case, the significant public investment in vaccine manufacturing must be protected such that the new facilities can not only operate without limitations on hours of operation or volume of production potentially imposed by adjacent residential uses. The ability to expand to increase vaccine research, development and manufacturing must also be protected. A buffer area around our site for noise, odor and emergency response are important considerations.

It is in this context that Sanofi recommends the following policy changes.

¹ Policies 1.2.6.1 and 1.2.6.2

² Proposed policy 3.5.2



Proposed Policy within new Provincial Planning Statement

- Continued recognition of the Sanofi facilities with a Provincially Significant Employment Zone, along with the policies set out below to strengthen the protection of industries within PSEZs.

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

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*.

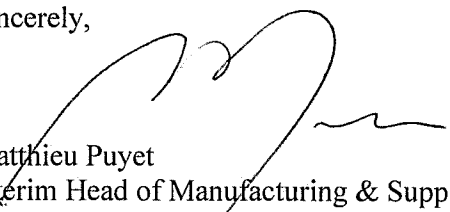
Planning authorities shall not permit *development* in or on *adjacent lands* to *provincially significant employment zones* that could preclude or negatively affect the operations and any potential expansion of existing *major facilities*. [Note: this policy could also be drafted to apply specifically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

Sanofi has worked, and will continue to work 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.

The proposed new PPS represents an opportunity to ensure that facilities in which significant public investments have been made are properly protected so that they can thrive and expand in the future. This can be done in conjunction with ensuring that other industries in provincially significant employment zones are protected so that Ontario’s economy can continue to grow.

Thank you for your attention to this matter.

Sincerely,



Matthieu Puyet
Interim Head of Manufacturing & Supply, Canada
Sanofi Pasteur Limited



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".

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