



OVERWATCH RISK: COMPARATIVE LOCATIONS

PUBLIC COMMENT SUBMISSION APPENDIX

RE: ERO Posting 025-1108, "Request for a Minister's Zoning Order ("MZO") to restrict building heights to protect a biomanufacturing campus in the City of Toronto"

November 4, 2025

Background

The Ministry of Municipal Affairs and Housing (MMAH) has asked for public comment on a proposed Minister's Zoning Order (MZO) to restrict building heights for the proposed purpose of protecting the Sanofi Pasteur campus located adjacent to the proposed Tenblock redevelopment site located at 1875 Steeles Avenue West in the City of Toronto. Further to my earlier submission dated October 29th, 2025, and my professional opinion that national security or business security concerns are neither created or worsened by a proposed development at 1875 Steeles Avenue West, I offer annotated images on the following pages of relevant comparative developments that present similar examples of sensitive critical infrastructure located in high-density areas where the risk of overwatch did not present a challenge to those developments.

Of particular note is Sanofi's expansive Cambridge MA location completed in 2022. If the risk of overwatch presents such a critical concern to Sanofi, it seems unusual that the company would have themselves chosen such a high-density urban location for a facility which appears, based on Sanofi's public statements, to be even more sensitive than their existing Toronto complex.

All graphics are based on publicly available information and imagery. Building heights, addresses, and uses are approximate and intended for illustrative purposes only. The data presented may not reflect exact or current conditions.

Comparative Locations:

Sanofi R&D Campus – 350/450 Water Street – Cambridge MA – In 2022, concurrent to its challenge to the proposed Tenblock development, Sanofi opened its 900,000 square-foot urban campus supporting 2,500 workers in downtown Cambridge MA. Among the declared research areas is vaccine development. Sanofi chose this location despite the existing high-rise facilities immediately adjacent to this innovation hub.

Public Safety Canada Headquarters – 269 Laurier Avenue W – Ottawa, ON – This facility includes the Minister's office and presents the key convergence point of sensitive matters relating to all of the Canadian national security portfolio agencies. Subsequent to the establishment of this location, two high-rise residential developments were completed immediately adjacent. The risk of overwatch did not preclude these developments.

NRC Campus – 1200 Montreal Road – Ottawa, ON – This location is a primary research hub for a number of Sensitive Technology Research Areas (STRA) that are crucial for Canadian innovation and that may be of interest to foreign states, state-sponsored and non-state actors seeking to misappropriate technologies. The introduction of a 26-story condominium development across the road for the NRC campus creates a dominant vantage point to observe movement with the NRC. The public record of this development project reveals no expressed concerns regarding the introduction of an overwatch risk from this new build.

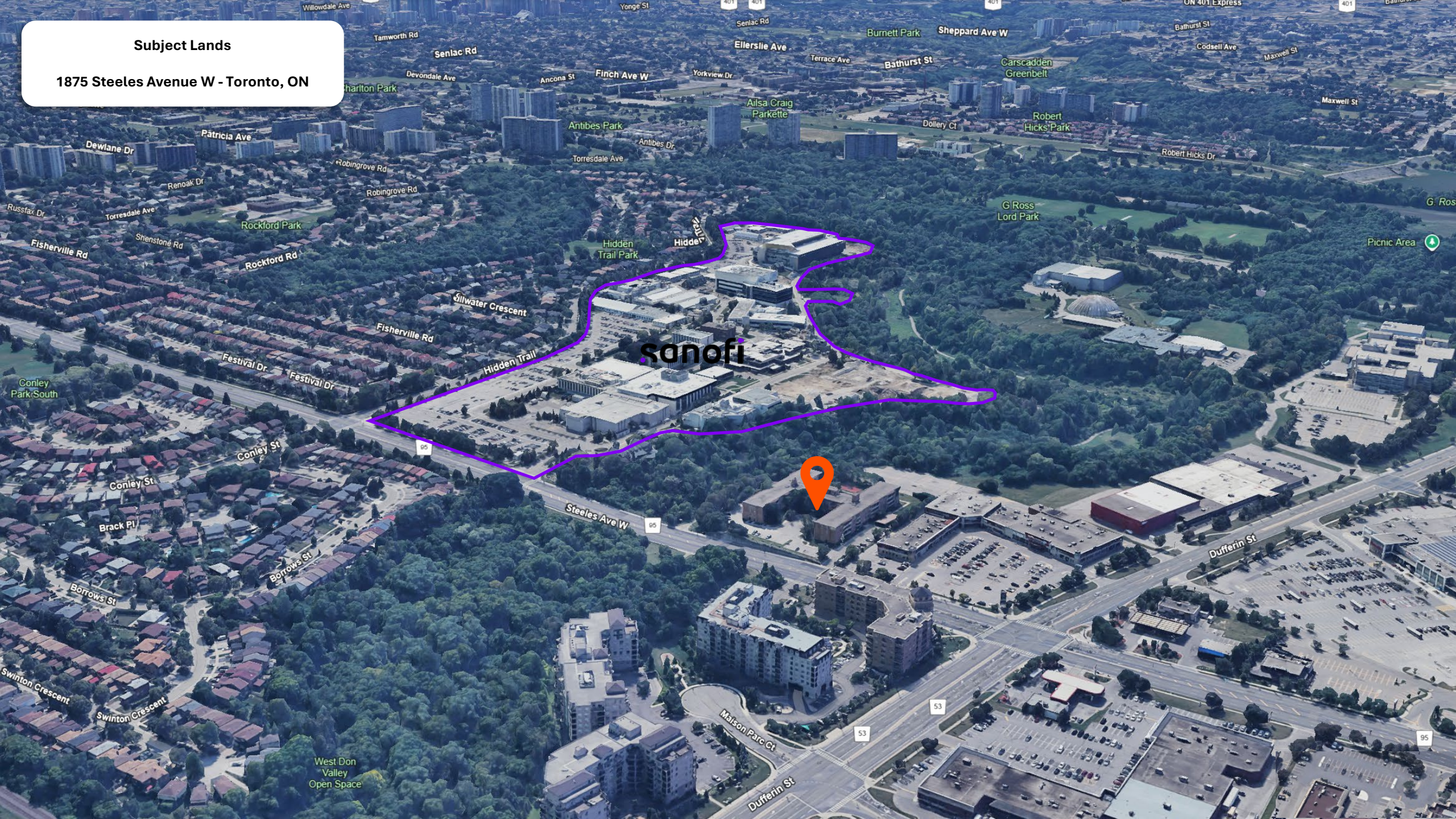
CSIS Headquarters/CSE Headquarters - The same condominium project discussed above also introduces a persistent, elevated vantage point to view both CSIS and CSE which was previously unavailable. These two highly sensitive locations in a single campus represent the core of the Canadian intelligence community. The public record does not reflect any evidence of overwatch concern expressed by either CSIS or CSE.

Canadian Armed Forces Headquarters – 101 Colonel By Drive – Ottawa, ON – While the main military headquarters has moved to the western part of the city, significant sensitive military activities continue to operate from this location. An existing 15-story location provides persistent overwatch of the Laurier Street entrance and into offices on the south/east sides of the building. A new 21-story apartment complex is under construction opposite of the north entrance also providing persistent overwatch. Security concerns did not preclude these developments.

Johnson & Johnson Innovative Medicine - Rehhagstrasse 79 – 3018 Bern, Switzerland – Acquired by vaccine manufacturer Johnson & Johnson in 2006, this site has existed alongside mid-rise facilities for its lifespan. The risk of overwatch from several buildings onto its open campus has had no demonstrable impact on continued operation. The site hosts over 300 employees performing highly sensitive biopharmaceutical R&D, having been involved with the creation of the Ebola vaccine and Johnson & Johnson's COVID-19 vaccine. Security concerns did not preclude the development or deployment of these vaccines.

Subject Lands

1875 Steeles Avenue W - Toronto, ON



Sanofi R&D Campus

350, 450 Water Street – Cambridge, MA

State-of-the-art facility designed to enhance collaboration between R&D, Medical, and the Specialty Care business units.

20 Child Street (Twenty20)

- 21 storeys, residential



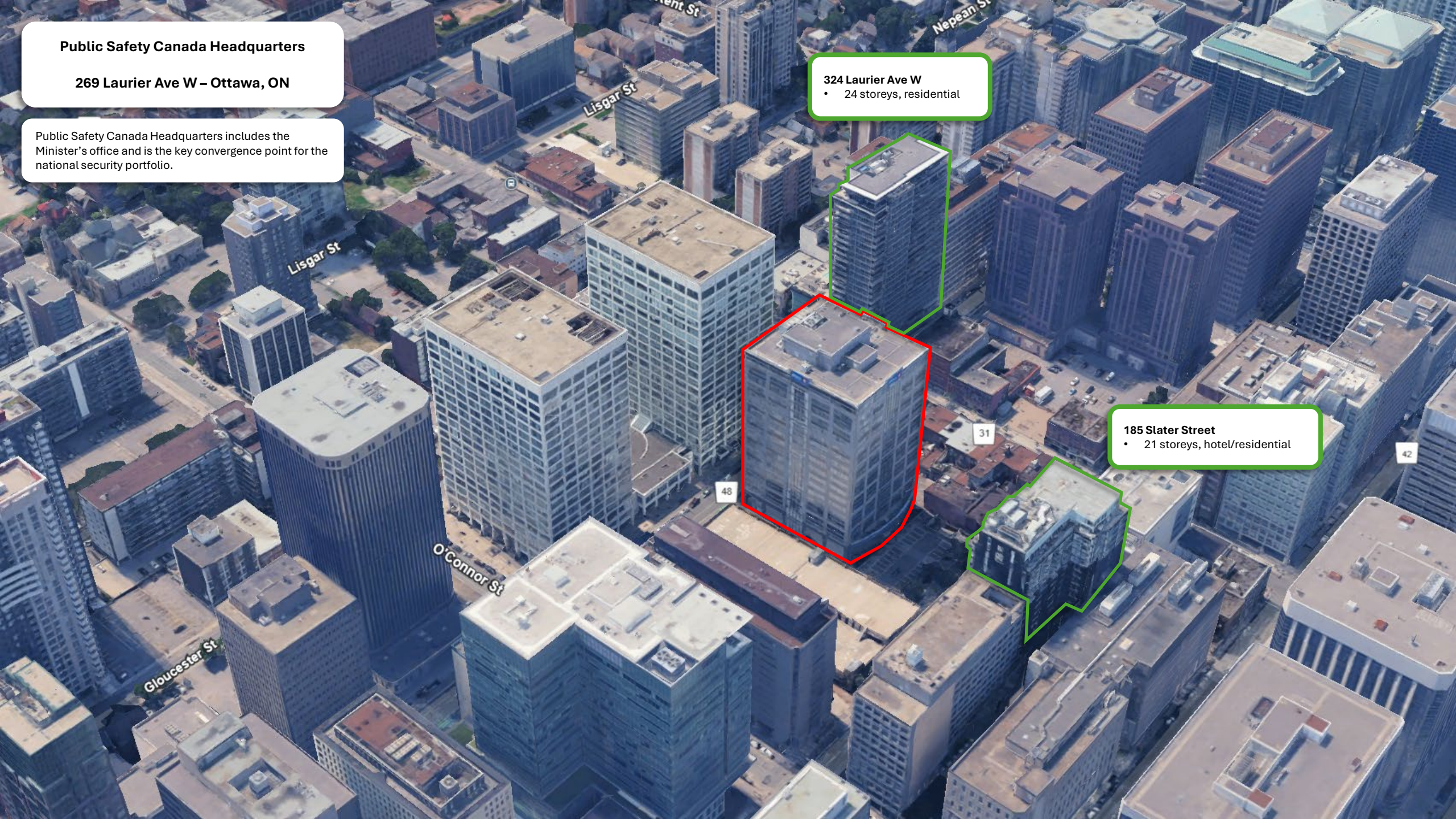
Public Safety Canada Headquarters

269 Laurier Ave W – Ottawa, ON

Public Safety Canada Headquarters includes the Minister's office and is the key convergence point for the national security portfolio.

324 Laurier Ave W
• 24 storeys, residential

185 Slater Street
• 21 storeys, hotel/residential





NRC Campus

1200 Montreal Road - Ottawa, ON

The **National Research Council** (NRC) campus houses highly sensitive research facilities including disease research, drug analysis and in-vivo testing.

Robin Crescent

Legget Ave

Montreal Rd

Montreal Rd

Mackenzie Dr

Mackenzie Dr

Blair Rd

Séguin St

Séguin St

Amberly Pl

1649 Montreal Road, 74 Blair Road

- 26 storeys, residential
- Under construction

**NRC Campus
CSIS Headquarters
CSE Headquarters**

**1200 Montreal Road - Ottawa, ON
1941 Ogilvie Road - Ottawa, ON
1929 Ogilvie Rd - Ottawa, ON**

The **National Research Council (NRC)** campus houses highly sensitive research facilities including disease research, drug analysis and in-vivo testing.

The **Canadian Security Intelligence Service (CSIS)** headquarters houses the federal foreign intelligence service and security agency of Canada.

The **Communications Security Establishment (CSE)** headquarters houses the federal cryptologic agency, providing Canada with cyber security and foreign intelligence.



**National Research
Council Canada**



1649 Montreal Road, 74 Blair Road

- 26 storeys, residential
- Under construction



**COMMUNICATIONS
SECURITY ESTABLISHMENT
CENTRE DE LA SÉCURITÉ
DES TÉLÉCOMMUNICATIONS**



**Canadian
Security
Intelligence
Service**

Canadian Armed Forces Headquarters

101 Colonel By Drive - Ottawa, ON

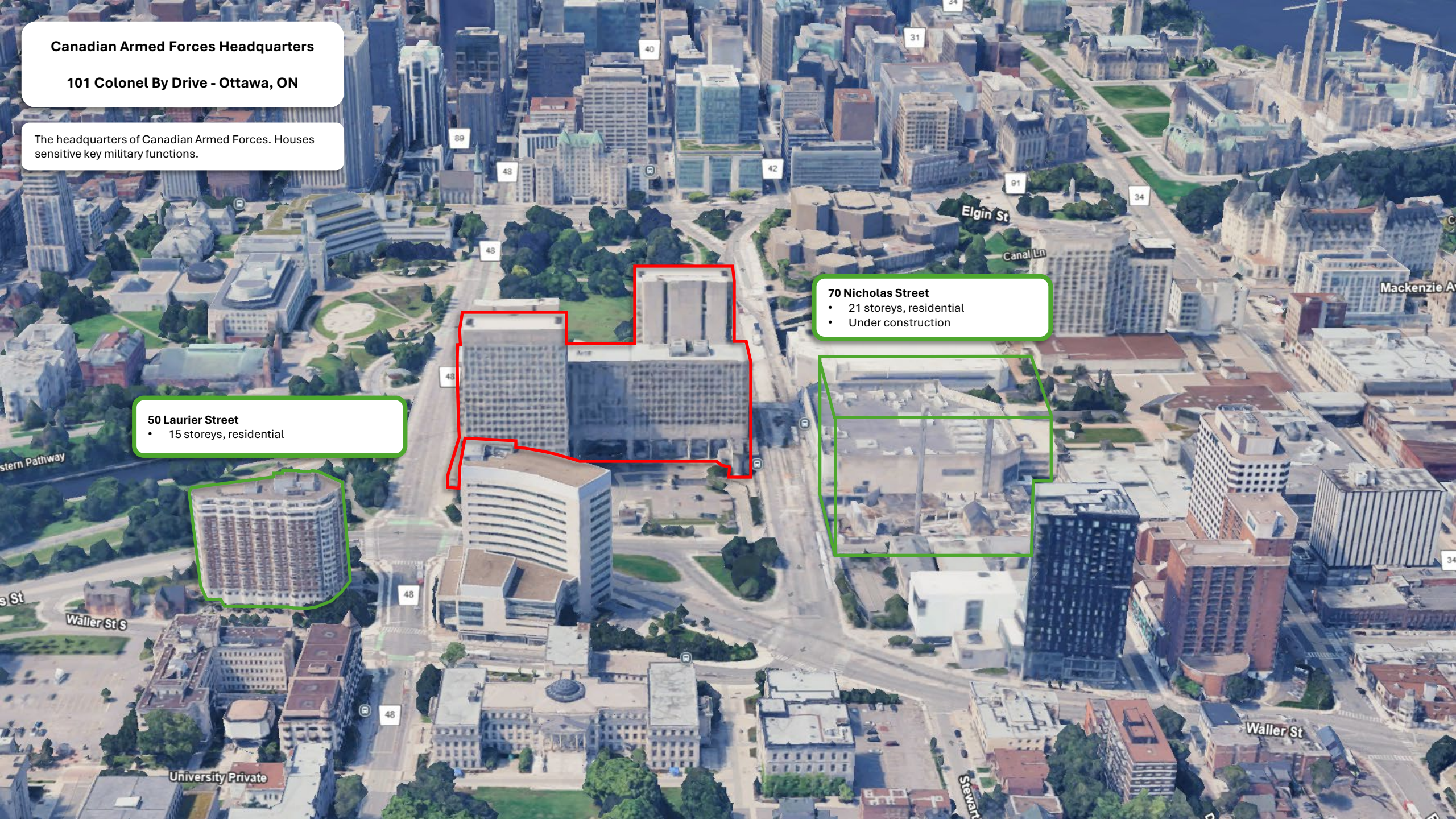
The headquarters of Canadian Armed Forces. Houses sensitive key military functions.

50 Laurier Street

- 15 storeys, residential

70 Nicholas Street

- 21 storeys, residential
- Under construction



Johnson & Johnson Innovative Medicine

Rehhagstrasse 79 – 3018 Bern, Switzerland

This Johnson & Johnson owned campus performs highly sensitive vaccine R&D and manufacturing. Of note, this facility developed the Ebola vaccine and was involved in development of the J&J COVID-19 vaccine.

Wangenstrasse 12-16, 3018 Bern

- 17 storeys, residential

Rehhagstrasse 45-47, 3018 Bern

- 17 storeys, residential

Wangenstrasse 63, 3018 Bern

- 8 storeys, residential

Wangenstrasse 50-56, 3018 Bern

- 15 storeys, residential

Wangenstrasse 40-46, 3018 Bern

- 10 storeys, residential

