



November 7, 2025

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file #000001-01434

Submitted via ERO Posting 025-1108

Ministry of Municipal Affairs and Housing
Municipal Services Office – Central Ontario
(Priority Projects)
777 Bay Street, 12th Floor
Toronto, ON M7A 2J3

Dear Sir/Madam:

**Re: ERO Number: 025-1108
1875 Steeles Avenue West
Request for a Minister's Zoning Order (MZO) to restrict building heights to protect
a biomanufacturing campus in the City of Toronto**

We are the lawyers for The Governing Council of the University of Toronto, the registered owner of a 12.08-hectare site located generally southeast of Steeles Avenue West and Dufferin Street in the City of Toronto, municipally known as 4925, 4961, and 5201 Dufferin Street (the “**University Lands**”), south of 1875 Steeles Avenue West and southwest of Sanofi Pasteur Limited’s manufacturing facilities and headquarters. The University is a party to the Ontario Land Tribunal proceeding related to 1875 Steeles Avenue West, the lands subject to the proposed MZO, and has otherwise been an active participant in planning matters related to the future of the Dufferin and Steeles area.

The University has reviewed the proposal for the above-noted MZO in relation to the operational viability of Sanofi. On behalf of the University, we request that the Minister of Municipal Affairs and Housing engage in further consultation with respect to the proposed MZO, consistent with the Ministry’s Zoning Order Framework, and also refer the proposal to the Office of the Provincial Land Development Facilitator to ensure the numerous Provincial interests at issue are considered in finding a resolution for future development in this area.

Background

The University Lands are developed and used for institutional purposes, including the University of Toronto Institute for Aerospace Studies, a University of Toronto Libraries facility, and the University of Toronto Press. It is critical for the University to maximize the use of its lands to serve its faculty, staff and students in a manner that supports the University’s overall financial sustainability.

The University Lands have co-existed with the biomedical uses at 1755 Steeles Avenue West, currently owned by Sanofi, for over a century. Indeed, the facility was originally owned and operated by the University, established as the Connaught Antitoxin Laboratories and University

Farm. The University subsequently sold the Connaught facility in 1972 (for \$2) to support the continuation of the work of these facilities, in anticipation of the continued growth of compatible uses on the University Lands. The biomedical uses and the various uses on the University Lands have been designed to and have in fact co-existed for a century in harmony and the future development of the University Lands will continue to reflect the symbiotic and compatible relationship of the mix of uses in this area.

The University is one of the largest landowners in the City of Toronto and over the next 15-20 years, intends to invest billions of dollars toward development projects that provide much-needed educational, research, and multi-use facilities. The University is also among the top 10 non-government employers in Toronto, adding \$12 billion stimulus to the GTA annually in the form of salaries, benefits, and expenditures of faculty, staff, and students. The University's global success depends on its continued provision of world class facilities, with the University Lands' size and location providing a unique opportunity to magnify the University's local and global significance. Restricting the height of development on lands in around Sanofi in the absence of any technical or reasoned basis is not appropriate, and if applied to the University Lands, would significantly and negatively impact the University.

Request for Further Consultation

The University would welcome the opportunity to discuss Sanofi's concerns with the height of adjacent development and the potential impacts of the MZO to the University's future development of the University's Lands and supports the request for referral to the Provincial Facilitator.

We thank you and the Province for this opportunity to comment on this instrument and look forward to continued discussion.

Yours truly,

Cassels Brock & Blackwell LLP



Signe Leisk

SL/AP/MLH

cc: Municipal Services Office - Central Ontario (mmahzoningorders@ontario.ca)