



MEMORANDUM

To: Mayor Olivia Chow and Chief Financial Officer, City of Toronto

Re: Development Charge Relief for Purpose-Built Rental Projects

Dear Mayor Chow and City Staff,

My name is Alex D'Orazio and I am the Co-Founder and Principal of Brixen Developments, a GTA-based developer and builder with purpose-built rental communities currently under construction and in operation across the GTA. Our team has advanced and delivered housing in multiple municipalities, including projects that are helping address Toronto's critical need for new rental supply.

I am writing to respectfully request that the City ensure purpose-built rental projects already under construction are eligible for any development charge relief program implemented through the Province's Development Charge Reduction Program.

We believe the fairest and most practical approach is to base eligibility on the issuance of a full Building Permit after March 30, 2026, or consistent with how development charge payment is currently triggered through the issuance of an above grade building permit, rather than the issuance of any building permit.

Suggested Policy Wording:

"Projects shall be eligible where a Full Building Permit authorizing the construction of the building above grade is issued on or after March 30, 2026. Early works permits, including demolition, shoring, excavation, servicing, foundation, and below-grade permits, shall not affect eligibility."

This approach recognizes the reality of phased permitting in Toronto, where many developments receive early works permits months or years before receiving a Full Building Permit.

Projects currently under construction represent housing that is actively being delivered today. Developers of these projects committed capital, secured financing, and assumed significant risk without certainty that additional government incentives would become available.

Restricting eligibility based on the issuance of any permit would inadvertently favour projects that deferred investment while disadvantaging projects that have already committed capital and are actively delivering housing. In our view, this would be inconsistent with the objectives of increasing housing supply and supporting housing affordability.

Our own Toronto purpose-built rental project is currently under construction and will deliver 308 new rental homes, including affordable housing. Like many rental developments, development charges have not yet been paid and will only become payable at occupancy.

BRIXEN

Using the full Building Permit as the eligibility threshold provides a clear, fair, and administratively simple solution that recognizes both future housing starts and projects already contributing to Toronto's housing supply.

Thank you for your consideration. I would welcome the opportunity to discuss this recommendation further.

Respectfully,

A handwritten signature in black ink, appearing to read 'A. D'Orazio', with a stylized flourish at the end.

Alexander D'Orazio
Co-Founder & Principal
Brixen Developments Inc.