

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

and

PERSONS UNKNOWN AND TO BE ASCERTAINED

Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

**RESPONDING MOTION RECORD
OF THE REGIONAL MUNICIPALITY OF WATERLOO
(Injunction Motion, Returnable August 8, 2025)
Volume 1 of 2**

July 2, 2025

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Court File No. CV-25-00000750-0000

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2ND AFFIDAVIT OF PETER SWEENEY

I, Peter Sweeney, of the City of Cambridge, in the Regional Municipality of Waterloo, AFFIRM:

1. I am the Commissioner of Community Services for the Applicant (the Respondent on this Motion), the Regional Municipality of Waterloo (the “**Region**”). As such, I have knowledge of the matters to which I depose below. Where my knowledge is based on information and belief, I indicate the source, and believe it to be true.
2. I previously affirmed an affidavit dated June 6, 2025, which was filed in the Region’s Application Record in the underlying proceeding (the “**1st Sweeney Affidavit**” or “**Original Affidavit**”). I understand that the 1st Sweeney Affidavit will be included in the Region’s Responding Motion Record for use on this injunction motion. I adopt and rely upon the 1st Sweeney Affidavit, and update certain matters below. I will continue to use the terms I defined in the 1st Sweeney Affidavit in this affidavit.

3. I affirm this affidavit as part of the Region's Responding Motion Record in a motion by certain named respondents for an injunction restraining the Region from enforcing the By-law.

A. *Enforcement of the By-law at the Encampment Since April 23, 2025*

4. As I explained in my Original Affidavit, my team is not responsible for enforcement of the By-law. However, given that the Encampment raises various health and safety concerns that my team must be responsive to – and which the By-law provides tools to address – I have been following the enforcement of the By-law closely.

5. The By-law was passed by Regional Council on April 23, 2025. To date, I understand that the Region has been taking a “light touch” approach to enforcement. Whether or to what extent that approach remains appropriate, in the Region's judgment, will depend on how circumstances evolve at the Encampment.

6. In my Original Affidavit at paragraph 112, I stated that, as of the date of that affidavit, there had been no prosecutions and no trespass notices issued under the By-law. This remains the case as of the date of this affidavit.

7. I understand from my conversations with the Region's by-law and security team that they have issued two verbal warnings for contraventions of the By-law. Generally, security issues warnings for various offences whether by-law related or specific to rules of the property. If the warning does not result in an escalation to an incident it would not be recorded as it would be a verbal warning to refrain from the behaviour and at this location.

8. The Region has not yet removed any person – whether an Existing Resident or otherwise –from the Encampment since the passage of the By-law, despite having the power to do so under the By-law for any person who was not a resident as of April 16, 2025.

9. As I previously explained in the 1st Sweeney Affidavit, since the By-law came into effect the Region has been able to place at least 13 Existing Residents in alternative living arrangements. However, approximately 17 new residents have come to the Encampment since then. There are also some recently-arrived self-styled “activists” for people experiencing homelessness who spend much of their time at the Encampment, including overnight stays, as set out below. As a result, the Encampment has grown in size, despite the placement of a number of Existing Residents in alternative accommodation.

10. I am concerned about the growing size of the Encampment because, as I explained in my Original Affidavit at paragraph 117, the more individuals who join the Encampment the closer to December 1, the more difficult it will be for my team to find alternative shelter and other accommodation for every person residing at the Encampment. Working with an individual to build an individual housing plan (“IHP”) takes time, coordination, and resources. Increased numbers of individuals at the Encampment also increase the challenges with respect to garbage and waste management, conflict between residents, the volume of drugs that find their way into the Encampment community, the potential for overdose deaths and health crises, fires that can cause injury and destruction of property, and pest control.

11. One particular group of activists operates under the name “FightBackKW” (“**FightBack**”). As set out below, FightBack engages in some tactics that in my opinion are unhelpful and do not advance the interests of the Residents. FightBack maintains a presence on social media. On May 1, 2025, one week after the By-law came into effect, FightBack posted on Instagram that “[t]he Region of Waterloo has demonstrated their disdain for Human Rights” and that “FightBack will be on-site at the 100 victoria Street Encampment indefinitely, 24 hours a day, to ensure the safety of our community members”. I attach FightBack’s May 1, 2025 Instagram post as **Exhibit A**.

12. The presence of activists who have come to camp at the Property since April 16, 2025 can complicate the process of monitoring the resident population and matching the needs of Existing Residents or more recent arrivals to available resources through IHPs. Nevertheless the Region is fully committed to offering services to all residents of the municipality who are genuinely in need of housing, whether they reside on or off the Encampment.

B. The Code-of-Use By-law and the Property

13. In addition to the By-law, the Region has a general Code of Use By-Law that applies to Region property throughout the municipality. It is the Region’s position that the Code of Use By-law continues to apply to the Encampment, albeit with the restrictions as outlined in the Persons Unknown Decision. I attach a copy of the Code of Use By-Law as **Exhibit B**.

C. *My Responses to the Moving Parties' Affidavits*

14. I have reviewed the affidavits filed on behalf of various named individual respondents on this motion for an injunction, served in the Motion Record dated June 6, 2025 and the Supplementary Motion Record served on June 23, 2025 (the “**Moving Parties' Affidavits**”). I offer the following responses to the affidavits contained therein.

1. Existing Residents under the By-law

15. As I explain in my Original Affidavit at paragraph 30, the By-law applies differentially to “Existing Residents”, who are individuals who were residing at the Encampment the date that public notice of the By-law was provided (being April 16, 2025).

16. Based on a review of the Region’s records and consultation with my team, I can identify the following 12 affiants of the Moving Parties’ Affidavits as persons staying at the Encampment whom we would not consider to be Existing Residents: Terra-Lynn Weber, Aaron Price, James Hammond, Jeremy Linton, Stephanie McMillan, Jason Paul, Julie Young, Kyle York, James Davis, Megan Lopes, Avery Ament, and Jakob Stubbs. Six of the Moving Parties’ affiants would be considered to be Existing Residents, of whom one unfortunately has passed away since swearing his affidavit (Matthew Stefanac).

17. To be clear, my team continues to provide supports to all unhoused individuals in the Region, whether they be residents of the Encampment or Existing Residents of the Encampment within the meaning of the By-law, or otherwise.

2. Individuals at the Encampment have been offered alternative accommodation

18. In reviewing the Moving Parties’ Affidavits, I noted that many affiants who are Existing Residents (within the meaning of the By-law and my Original Affidavit) or who

are otherwise residing at the Encampment state that they have not been offered alternative accommodation by the Region.

19. I am unable to comment on specific individuals' claims regarding whether the Region's team of unhoused support workers ("**USWs**") has contacted them with an offer of alternative accommodation. The Region's team of USWs are licensed professionals, consisting of registered social workers and social support workers and a registered nurse, who are all bound by duties of confidentiality. My team takes our responsibility to guard the confidentiality of the individuals we support very seriously, and I would require the informed consent of each individual affiant to break that confidentiality and divulge conversations held with respect to IHPs and referrals to temporary accommodations such as emergency shelter programs. I am therefore currently unable to speak to whether specific affiants have been offered alternative shelter in working with my team, even if I see inconsistencies in the Moving Parties' Affidavits.

20. In general terms, I can say that over the past three and a half years since the Encampment was established at 100 Vic, my team has had a consistent and ongoing presence at the site. USWs are present at the Encampment most days and generally from the hours 11 am to 1pm. They have worked tirelessly to engage with as many individuals as possible, offering supports that include connections to Ontario Works, health supports, addictions supports, and housing supports (including the offer of temporary shelter and in some cases, permanent housing, where available and appropriate). Since April 16th, our team has supported transitioning 13 individuals from 100 Vic to alternative accommodation.

21. Based on the above, I am confident that any resident of the Encampment who has resided there for more than a week has had supportive conversations with and/or received offers of help from our USWs, or was at the very least presented with the opportunity to have those conversations (given that doing so is voluntary).

3. The Region has expanded shelter capacity since the Persons Unknown Decision

22. Many of the Moving Parties' Affidavits – including the affidavit of Sara Escobar ("**Escobar Affidavit**"), the affidavit of David Alton ("**Alton Affidavit**"), and the affidavit of Angela Allt ("**Allt Affidavit**") discuss the shelter system and the shortcomings that they perceive in this system.

23. I recognize that, like most solutions aimed at addressing complex social problems such as homelessness, no one solution will be perfect, including shelters. However, shelters and motels are a way for many people to have access to a roof over their head and the other benefits that come from being housed, even in temporary accommodation. Accessing a motel or hotel is often an important first step in a person's IHP and is typically the way that an unhoused individual obtains the stability to transition into more long-term housing.

24. Despite the general representations about lack of access to shelters in the Escobar Affidavit, as I outlined in my Original Affidavit at paragraph 56-86, the Region has been making consistent increases in both the funding available to support unhoused individuals generally and in the number of shelter spaces available in shelters and transitional housing sites operated and/or funded by the Region. This includes by keeping two winter

warming centres open for additional months this calendar year (see paragraph 74 of my Original Affidavit).

25. The Escobar Affidavit also references the closure of the King Street Shelter. I note that while this shelter has closed, the Region has increased the number of available spots at shelters and transitional housing since the Persons Unknown Decision. I also note that the Region also purchased a women's shelter from the YW-Kitchener Waterloo in July 2024 after that organization made the decision to close its operations at the location. Since that time, we have been renovating the existing building while also using it as a smaller women's shelter since December 2024. It will reach full capacity again later this fall. The Region also opened a new 20-bed shelter in Cambridge in February 2025, called the YW Cambridge Women's Shelter.

26. For reference, the King Street Shelter was from the outset intended to be a temporary shelter, that would close within 24 months, which was widely known in the community and represented as such to Council. However, the Region went above and beyond this commitment, and was able to extend the King Street Shelter's operations by seven additional months, from June 2024 (when it was originally set to close) until March 31, 2025.

27. I further stress that while I have commented on the shelter capacity of Region-operated and/or Region-funded shelters, other organizations and levels of government operate and fund shelters beyond what is reflected in the Region's numbers in my Original Affidavit. Also, motel spaces are not captured within the existing shelter count.

28. While shelter and motel beds are not permanent long-term housing solutions, they are often important steps within an IHP to help an unhoused individual obtain the necessary stability to begin transitioning to more long-term options.

29. Different shelters are designed to address different individuals' needs, as explained at paragraph 71 of my Original Affidavit. I would also add that the shelter referenced above which the Region purchased from the YW Kitchener-Waterloo and reopened after it shut down is a shelter specifically for women. The YW Cambridge Women's Shelter in Cambridge that was opened in February 2025 is also a women's-only shelter.

30. The Moving Parties' Affidavits also refer to the difficulty of finding shelters that will accept couples. I first note that motel options and the Region's Erb's Road shelter are friendly to couples. However, I recognize that many shelters serve individuals only, and not couples. This is not something that is specific to the Region, but rather arises from the more universal problem of addressing intimate partner violence. Shelters are tasked with balancing the desire to provide couples with the opportunity to share a room with the practical reality that some relationships involve an element of violence and/or coercion. Given this, most shelters accommodate unhoused people on an individual basis, not as couples, to limit the risk that the victims of intimate partner violence have this form of violence perpetuated against them within the shelter system.

31. In any event, Region staff are very aware that there is no "one size fits all" solution for the varying needs of people experiencing homelessness. That is why the USWs work with residents to develop IHPs, as described below.

4. Encampments are inconsistent with the Plan to End Chronic Homelessness (“PECH”)

32. The Alton Affidavit (at paragraph 6) says that it is “unfair” of me to claim that an alternative encampment site is inconsistent with the PECH. However, I stand by that statement in my Original Affidavit. The stated goal of the PECH is to “end chronic homelessness in Waterloo Region” in order to reach “functional zero chronic homelessness” (see page 46 of my Original Affidavit, from the PECH itself). The Encampment, being a collection of largely chronically unhoused individuals, is entirely inconsistent with this aim. It is precisely the sort of emergency based and non-permanent housing focused response that the PECH is seeking to move away from (see page 100 of my Original Affidavit, from the PECH itself).

5. The importance of USWs and IHPs

33. In my Original Affidavit I detail the role of the Region’s USWs in working with unhoused individuals to develop IHPs (see paragraph 12 and following).

34. The Altt Affidavit makes several assertions about the benefits of the Encampment. However, this portrayal of Encampment living does not consider the following key considerations:

- (a) Individuals living in an Encampment remain transient, as demonstrated by some of the Moving Parties’ Affidavits, which detail movement in and out of the Encampment by individuals. I therefore disagree with the Altt Affidavit’s assertion at paragraph 7 that it is easier to find clients when they stay at the Encampment;

- (b) Even if it were easier to track down clients living at the Encampment, this sort of provider-centric approach is based on the wrong considerations, in my view. Instead, providers of supports to unhoused individuals should do what is best for those individuals. In the experience of my team and under the approach of the PECH, that means being housed. This idea of meeting a person's specific needs is the entire premise of an IHP, which aims to tailor an individual's steps to housing to their specific situation;
- (c) Shelters and motels, while not designed to be permanent solutions to homelessness, are often key steps in an unhoused person's path towards more sustainable long-term housing. For many, the stability that motels provide (a door that closes and locks, showers, a bed) is essential to helping unhoused individuals to stabilize and recover; and
- (d) Encampments are not solutions for preventing drug use deaths. They are not formal safe consumption sites, and the ability of an individual to go back into their own tent (as one might go back to their own room in a motel) reduces the ability for collective watch over those who use drugs. In shelters, staff are trained on addressing overdoses, and are better suited to prevent overdose deaths and health crises.

6. No lack of community engagement as referenced in the Moving Parties' Affidavits

35. The Alton Affidavit refers to the Social Development Centre Waterloo Region ("SDCWR") and the Lived Experience Program ("LEP") which I believe refers to a roster of individuals with lived expertise that help to inform the PECH. At para. 11, David Alton

refers to a March 7, 2024 meeting, and alleges that the Region declined to follow up with engagement promised at that meeting.

36. This allegation lacks context. I was invited to this meeting together with members of my team, but it was on an *ad hoc* basis rather than being part of a formalized structure. In general terms, I am happy to meet and engage with members of the community. The Region does so in a number of settings. For example, the Region participates in monthly meetings of the Co-Creators Working Group, with various community representatives including the WRCLS. In my experience, there has been no lack of community engagement by the Region.

7. Some conduct by some “activists” is not constructive

37. The Moving Parties’ Affidavits also refer to self-styled advocacy and activist organizations that oppose the Region’s efforts to address homelessness, including Fight Back. I am familiar with Fight Back as a activist group that is very vocal around housing and homelessness. On its website (<https://fightbackkw.wordpress.com/about/>), Fight Back describes itself as “an intersectional leftist activist group of community members that works at a grassroots level to fight systemic inequities and violence in Waterloo Region”.

38. Of course, Fight Back and its members are entitled to have their opinions on the Region’s policies, and on how governments should address the complex problem of homelessness more broadly. However, I am concerned that some of Fight Back’s tactics are not constructive, and even harmful to unhoused individuals. I also take issue with the

highly antagonistic and obstructionist way Fight Back has engaged with the Region and its representatives, including members of my team.

39. I would describe some activists including those associated with Fight Back as being at times highly obstructionist when the Region's staff – including USWs – have tried to assist unhoused individuals with housing and support plans. While shelters are not perfect solutions to homelessness, these activists' opposition to shelters has led them to encourage unhoused individuals to resist accepting shelter offers. For example, I remember being present at the site of the encampment that was located at 150 Main Street, Cambridge ("**150 Main Encampment**") when it was first established. I observed activists encouraging unhoused individuals to come to the site and set up tents there.

40. I have also been informed by my team that members of Fight Back have been encouraging individual unhoused people at 100 Vic to resist working with USWs to develop IHPs and have been encouraging them to remain at the Encampment.

41. Fight Back also regularly interferes with the provision of services to the Encampment. For example, as I describe in my Original Affidavit, the Region regularly services the Property to mitigate the various health and safety risks that the Encampment produces. On days where this occurs, members of Fight Back are often confrontational with the Region's staff and the Region's agents on the Property, which makes doing this work incredibly difficult.

42. Fight Back has also made disparaging personal comments about me and members of my team. I and leaders on my team, Regional by-law and facilities staff, contracted security guards, and USW staff who are consistently supporting the unhoused

community as part of their daily work have been called “Nazis”, “fascists”, and “murderers” in public settings on numerous occasions. For example, at the March 7, 2024 meeting described beginning at paragraph 11 of the Alton Affidavit, members of Fight Back referred to me and members of my team present as “Nazis”. I understand that everyone is entitled to their opinions, but those are heavy and threatening, and frankly, ridiculous accusations to make. My team members are just trying to do our jobs and support the Region’s unhoused population. The USW team in particular are dedicated professionals who have devoted themselves to helping vulnerable members of the community in incredibly challenging circumstances. They do not deserve this treatment.

43. Fight Back has also posted pictures of myself, my team, my colleagues, and even community leaders on social media platforms and on telephone polls around downtown Kitchener. I attach some examples as **Exhibit C**.

8. Prior Encampments in the Region

44. The Escobar Affidavit mentions two prior encampments in the Region, the 150 Main Encampment and an encampment at Soper Park in the City of Cambridge (“**Soper Park Encampment**”).

45. As I mention above, I was present at the 150 Main Encampment on the day it was started in September 2022. I recall observing activists encouraging unhoused individuals to set up tents at that location and representing to them that the Region could not remove them due to the litigation leading to the Persons Unknown Decision, which was then underway.

46. As with the Encampment at 100 Vic, the Region provided supports to the 150 Main Encampment, such as port-a-potties, garbage bins, and coordinated access for a community health vehicle to assist residents of that encampment. Regional staff also visited consistently to offer support with IHPs. Despite the Region's efforts, the 150 Main Encampment posed significant health and safety risks to its inhabitants and the public. There were several major fires on the site.

47. There were also widespread issues with violence at the 150 Main Encampment, including one incident of an attempted murder. Concerns about the general public's safety were heightened due to a commercial building located adjacent to the site of the 150 Main Encampment, with significant foot traffic, meaning that there was a risk that violence arising from encampment residents could spill over and affect passers by.

48. As a result of the risks to the public (including encampment residents) of both the fire and the violent behaviour, part of the site at 150 Main was fenced off after a particularly large and dangerous fire heavily damaged that area.

49. The 150 Main Encampment ended when the final two residents accepted offers of alternative accommodation and the site was closed by the Region. Based on this, I do not think it is fair or accurate to say that those currently living at 100 Vic were simply displaced from 150 Main and relocated to the Encampment.

50. The Escobar Affidavit also references an encampment at Soper Park in Cambridge. The Soper Park Encampment is not within the Region's jurisdiction, but is rather within that of the City of Cambridge, so I am unable to comment on any enforcement or resettlement that took place there.

51. The Alton Affidavit references an encampment in Victoria Park, Kitchener (the “**Victoria Park Encampment**”). The Victoria Park Encampment was on land owned by the City of Kitchener. While the Region’s USWs provided supports to individuals living in the Victoria Park Encampment, the Region was not otherwise involved with that encampment.

9. Security onsite at the Encampment

52. I identified several assertions – many of them inaccurate – in the Moving Parties’ Affidavits regarding the presence of security at the Encampment following the passage of the By-law, which I will address below.

(a) Positioning of the security vehicle

53. Many of the Moving Parties’ Affidavits raise concerns with the presence of security at the Encampment.

54. As I explain at paragraph 88 of my Original Affidavit, the Region has assigned security guards to the Property to monitor and respond to issues arising from the Encampment since March 2022. The Region did this because the Encampment had become very large with numerous disruptions and complaints from the public, open fires and fires within tents, and the Region was concerned for the safety of Encampment residents and others living and working in the general vicinity of the Encampment. As a result, even before the By-law was enacted, the Region had retained Barber Collins Security for this purpose, and security personnel have been onsite at the Encampment on a daily basis.

55. As it became clear that the By-law would be put before Regional Council, my team became concerned about potentially escalating tensions at the Encampment. In particular, given my team's experience around the time that the Persons Unknown Decision was being litigated, the Region had concerns about the presence of individuals at the Encampment who are not unhoused and who may try to interfere with the provision of services to Existing Residents.

56. Given these concerns – which have held true following the passage of the By-law – the Region concluded that having security positioned closer to the Property and able to control vehicular access to the Property was needed. Previously, security was parked offsite on an adjacent lot.

57. With the addition of a site trailer to the Property (which I will discuss in more detail below), the security features of the Property also changed. Prior to the trailer being placed on the site, security was parked offsite, with a line of sight to monitor to the Encampment. However, after the trailer was added, that line of sight was compromised, which motivated the decision to move the security vehicle onto the Property.

58. To be clear, the Region's direction to security about the placement of the security vehicle has not changed, and there has been no specific direction from the Region to security to block off the Property using the vehicle. This is something that security has done because it sees this as necessary to effectively monitoring the Encampment.

59. As I explained in my Original Affidavit, the presence of security at the Encampment is essential given the significant risks that an encampment entails to its residents and the broader public (see paragraphs 94 and following of my Original Affidavit).

(b) Access to the Property

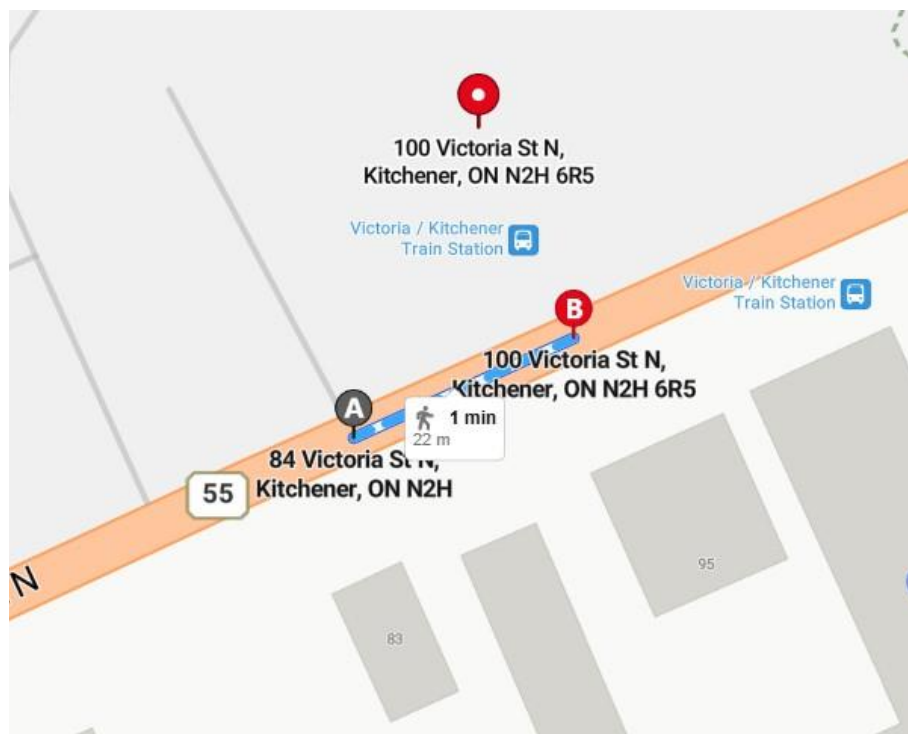
60. The Region has not taken steps to restrict access to the Property. Visitors and residents who were not present as of April 16, 2025 have been permitted to come and go as they please.

61. The Region has directed that in most cases, community vehicles (i.e., vehicles that are not affiliated with the Region or its employees/delegates/agents/etc.) should be redirected to the parking lot on the adjacent site located at 84 Victoria Street North, rather than being permitted to park on the Property. As I explained at paragraph 111 of my Original Affidavit, parking is not currently available directly at the Property for safety and space reasons – especially as tensions rise and given that the population of the Encampment has grown. It is worth noting here that Regional housing staff do not, and have not, parked at 100 Victoria when visiting the site to offer supports.

62. The exception to the prohibition on community vehicles parking on the Property is that anyone who has a physical disability and needs to access the Property may park directly onsite. For example, when counsel for the named Respondents raised the issue of a member of the WRCLS legal team requiring access to parking on-site at 100 Vic for mobility reasons, counsel for the Region provided WRCSL counsel with assurances that they could park at 100 Vic as long as they identified themselves to security. WRCLS counsel were also offered use of the on-site trailer to meet with their clients, provided they gave notice of when they would be attending, and provided such use did not conflict with the Region's use of the trailer. I attach an exchange of emails between counsel for the Region and WRCLS counsel dated ____ as **Exhibit D**.

63. Asking individuals without disability-related accommodation needs to park at the site adjacent to the Property is not an onerous ask.

64. For reference, below is a screen capture image indicating where the Property is in relation to 84 Victoria Street North, which I included in my Original Affidavit:



65. Those bringing donations or offering other assistance (including legal counsel) have been directed to use the adjacent site at 84 Victoria Street North to park vehicles as needed.

66. The affidavits of Jeremy Linton and Noah Helsby both make broad speculative assertions about how donations have decreased to the Encampment since the By-law, or about how blocking vehicular access to the Property for vehicles has affected donations.

67. To be clear, the Region has not prohibited donations from being dropped off at the Property and has no plans to do so. Instead, the Region has confirmed instructions to security that donations should be allowed to be dropped off onsite. Donations to the site are often large in volume and are not requested by people living on site. This results in a significant amount of waste (food and items/belongings) on site. Food waste contributes to active pest issues on site.

68. Indeed, as Julie Lukezic's affidavit explains at paragraphs 7-12, she was able to bring a donation to the Property following the passage of the By-law, even if she faced minor inconvenience by having to park in the adjacent lot instead of on the Property itself.

69. In Margaret Chee's affidavit, I was struck by the fact that she asserts at paragraph 4 that she feels as though she cannot drop off food at the Encampment anymore because she does "not want to have conflict with security". She makes this assertion apparently without having tried to drop off donations at the Property following the passage of the By-law. Contrary to her concern, as mentioned above, security has been directed to allow donations to the Encampment, so there would be no reason for conflict. Ms. Chee also mentions, at paragraph 7, that she has an injured leg and therefore she cannot carry her donations from the parking lot to the Property. As I explained above, this is precisely the sort of situation that Ms. Chee could mention to security, and that security has been directed by the Region to accommodate. It does not appear from her affidavit, however, that Ms. Chee has made this request.

(c) Lights of the security vehicle

70. I noted that the affidavit of Jeremy Linton references security using “bright lights”. Jacara Droog’s affidavit specifically references the security vehicle’s lights shining directly onto a tent at night.

71. There has not been a direction from the Region to shine lights at residents. To my knowledge, there have not been any complaints to my team or to security about the incidents detailed in the Moving Parties’ Affidavits regarding these lights. To the contrary, residents have complained that the Property was too dark and asked that lighting be installed, which the Region did earlier this year.

72. I do not know the exact circumstances of the incidents that these affiants are referencing. However, as detailed in my Original Affidavit, violent incidents and other dangerous behaviour from residents are common occurrences at the Encampment. When security needs to address such an incident or provide assistance to a resident in distress at night, headlights, flashlights, or other lighting is used to enable this to occur.

10. The death that occurred on May 1, 2025 was unrelated to the Region’s acts or omissions

73. The affidavit of Aaron Price describes the death of an individual living at the Encampment that occurred on May 1, 2025. At paragraph 16 of that affidavit, Aaron Price explains that Emergency Medical Services were called earlier that day because a resident of the Encampment had overdosed, and that “[t]he ambulances had to park on the road because the security vehicle was blocking access [to the Property], and that when asked to move, security moved the vehicle “very slowly and only slightly” such that “[t]here was still not enough room for the ambulance to get onto the [Property]”.

74. This paragraph lacks context. The Region's information is that parking the ambulance at the curb beside the Encampment was normal procedure, that the ambulance crew did not ask or want the security vehicle to move, that there was no delay in attending the resident, and that in fact, the resident had been deceased for several hours when the emergency call was made. This is set out in the affidavit of Brent Wood, to be filed as part of the Region's Responding Record.

75. At Exhibit G to my Original Affidavit, I attach a major incident notification report summary ("**Report Summary**") for the incident dated May 1, 2025, that sets out the context of this request for Emergency Medical Services ("**EMS**").

76. The "Description of Event" notes in the Report Summary indicate that "Onsite security [was] informed that a Subject overdosed and is now deceased. Security is contacting 927 [emergency services]". The notes further indicate that the Coroner was onsite at 2:57 p.m., and that the "Coroner has stated...that the Subject has been deceased since 9 a.m.".

77. In any event, I am also advised by my staff who were present that day that EMS was in no way prevented from accessing the Property, and that security made clear that the security vehicle could be moved if that was needed (which it was not).

78. If anything, this tragic story further highlights the dangers of encampment living. A high proliferation of drugs in a concentrated area can lead to tragedies like this death. As one of the affiants for the Moving Parties, Calvin Sharpe, notes in his affidavit at paragraph 10, there are a lot of illegal drugs present at the Encampment. This makes the

Encampment a dangerous space to live for those experiencing the intersectional challenges of substance use/misuse and homelessness.

79. This incident also exemplifies the importance of having security on site. I understand from reviewing the Report Summary that security called emergency services once the resident was discovered, a role that the security team often plays when emergencies occur at the Encampment.

80. I was dismayed to see Aaron Price's misleading account of these events in his affidavit. On May 2, 2025 WRCLS made similar allegations in a letter to counsel for the Region, and again in a press release later that day. Counsel for the Region responded that same day with the relevant facts, including that the ambulance was able to access the site with no delay. It is concerning that the Moving Parties would put Mr. Price's account forward without confirming the facts, or even advertizing to the Region's letter refuting the facts alleged by some residents. I attach the exchange of correspondence between WRCLS counsel and counsel for the Region dated May 2, 2025 as **Exhibit E**.

11. Security is collecting names of individuals present at the Property to determine who is an "Existing Resident" of the Encampment

81. The affidavits of Jacara Droog and Eddy Grignon both reference that security is collecting names of people who are onsite at the Encampment. There is a simple explanation for this: given that the By-law applies differentially depending on whether an individual is an "Existing Resident" within its meaning (as I explain at paragraph 30 of my Original Affidavit), security needs to know who is such a resident in case enforcement measures are ultimately taken.

82. Security is therefore collecting the names, on a voluntary basis, of all those who were residing at the Encampment prior to April 16, 2025 in order to keep track of who is an “Existing Resident” for the purposes of the By-law.

12. Existing Residents are allowed to move their tents within the Encampment

83. The affidavits of Aaron Price, Eddy Grignon, and Jacara Droog all reference incidents involving residents of the Encampment moving their tents. To be clear, the By-law does not prevent Existing Residents from moving tents that were already in place as of April 16, 2025, with the Region’s permission. The prohibition on erecting a shelter or other structure in section 1 (d) of Schedule “B” to the By-law applies “provided, however, that this [prohibition] shall not apply to shelters or other structures that were in place on [April 16, 2025]”.

84. On some occasions, residents have been asked by security or the Region’s staff to move their tents so that the garbage bins that are on the Property can be safely emptied.

85. I have not heard of anyone who has been subject to a fine or any other repercussion under the By-law for moving their tent. Indeed, none of the Moving Parties’ Affidavits seem to indicate otherwise.

86. I note that the incident detailed in Eddy Grignon’s affidavit occurred prior to the enactment of the By-law. Without knowing more details, this sounds like a misunderstanding and that no enforcement of the (at the time) draft By-law occurred in any event.

87. I note as well that security staff are working to educate individuals at the Encampment about the By-law. I noted in many places in the Moving Parties' Affidavits that individuals stated that they lacked information about the By-law. It is possible that the incident referred to above occurred in the context of security seeking to educate residents about the By-law, rather than enforcing the By-law.

13. The presence of additional infrastructure on the Property is necessitated by the needs of Encampment residents

88. Many of the Moving Parties' affidavits refer to changes to infrastructure on the Encampment. I will respond to each below.

(a) The additional dumpsters

89. First, some of the Moving Parties affidavits refer to the addition of multiple dumpsters to the Property. As I outlined in detail in my Original Affidavit (see paragraphs 89-94) the presence of garbage has been an issue at the Encampment since it was first established. As a result, the Region has arranged for a regular cleaning of the Property and garbage disposal. The Region has also retained pest control to address a rat infestation present at the Encampment – a problem that becomes worse when garbage accumulates and is not properly disposed of.

90. The Region added garbage bins to the Property before the By-law was enacted such that there were five such receptacles on the Property. This was done in part given that the Region needed to plan for a possible influx of new residents at the Encampment following the commencement of this Application. As set out above, a number of new residents have arrived, many of whom have been encouraged by Fight Back and/or other

activists to go to the Encampment. It is logical that the more individuals there are residing at the Encampment, the more garbage there would be as a result.

91. Since the additional bins were added on April 16, 2025, all five bins have been either full or nearly full when they are emptied every two weeks. The presence of these bins is an important component of maintaining the health and safety of those present at the Encampment. It is therefore imperative that waste be collected and disposed of to reduce the risk of disease and vermin. However, I am disappointed to say that the Region has faced opposition from local activists when it tries to take steps to ensure the health and safety of residents, such as emptying the bins on the Property.

92. In response to these community pressures and as an act of good faith, the Region removed one of the bins (so there are currently four on the Property) on June 26, 2025. This means that the Property will have to be serviced more often to ensure that the large amounts of garbage accumulating at the Encampment can be properly dealt with.

(b) The site trailer

93. Second, some of the Moving Parties' affidavits have referred to the addition of a site trailer to the Property. This was placed on the Property prior to the passage of the By-law to accommodate private conversations between USWs and residents of the Encampment.

94. As I explained in detail in my Original Affidavit, developing an IHP often involves building a level of trust between an individual and a USW. For an IHP to be appropriately tailored to an individual's needs, the individual must discuss various potentially private, sensitive, and often upsetting details about their past. As the Property has no permanent

buildings and there are health and safety concerns with USWs going inside residents' tents, the Region decided to place a trailer onsite to serve as a safe, convenient, and confidential space.

95. Disappointingly, USW staff have often been prevented from having these private conversations through active obstruction and interference by members of Fight Back. Fight Back members frequently use their phones to record individual conversations and repeatedly tell residents that they don't need to, or should not, listen to the advice of, and get the help of USW staff. This interferes with residents' ability to access services and get support they are asking for.

96. Placing the trailer was deemed particularly necessary now given that the By-law has made the work of USWs more urgent because there is now a date by which all residents of 100 Vic must leave the Property (which, as I explained in my Original Affidavit, is similar to what happens when a shelter closes).

(c) Port-a-potties

97. Third, the affidavit of Jeremy Linton claims that the Region has removed two port-a-potties from 100 Vic. This is not the case. Instead, two port-a-potties were added to the Property given the increasing need for such infrastructure (as with the garbage bins) and the serious health consequences that can arise when human waste is not properly disposed of at the Encampment.

14. The Region has not interfered with water access to the Encampment

98. Paragraph 21 of the Affidavit of Jacara Droog refers to a water tap that is located at a site across the street from the Property.

99. To be clear, the Region does not control access to this tap. In any event, my understanding is that it remains open for use. The Region has never taken any steps to restrict access to water by residents.

100. In fact, members of Fight Back have been observed taking cases of donated water that are put on openly available donation tables and putting them in tents that belong to members of their group (who are not experiencing homelessness).

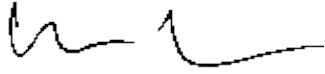
101. USW staff regularly bring and give out water as part of their visits. There are also other sources of water nearby. 87 Victoria, a drop-in service hub less than 100 meters from the site across the street, is a location where individuals can access water. Another daytime drop-in service at St. John's Kitchen that provides daily meals and access to water/drinks is 400 meters or a 6 minute walk away.

15. USWs work to accommodate individuals with diverse needs

102. USWs are specifically trained and credentialed employees of the Region, which is why they are entrusted with the responsibility of assisting unhoused individuals to find alternative shelter or more permanent accommodations. As regular practice, USWs provide taxi chits to assist individuals in physically accessing shelters where they choose to do so. I know that, in some cases, USWs will travel with the unhoused individual heading to a shelter in a taxi to assist them on this journey.

103. I make this affidavit in response to the motion for an injunction, and for no improper purpose.

AFFIRMED by Peter Sweeney of the City of Cambridge, in the Regional Municipality of Waterloo, before me at the City of Toronto, in the Province of Ontario, on July 2, 2025, in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits
(or as may be)

Andrew Lokan
(LSO # 31629Q)



Peter Sweeney

This is **Exhibit A** referred to in the Affidavit of Peter Sweeny, affirmed by Peter Sweeny of the City of Cambridge, in the Regional Municipality of Waterloo, before me at the City of Toronto, in the Province of Ontario, on July 2, 2025, in accordance with O. Reg. 431/10, Administering Oath or Declaration Remotely.



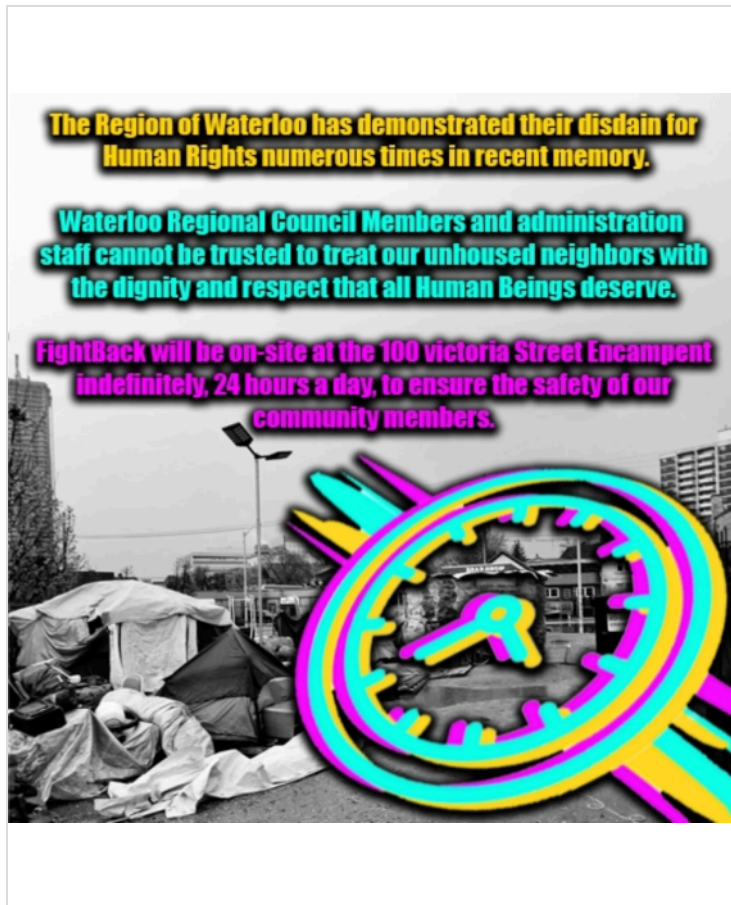
Commissioner for Taking Affidavits (or as may be)

Andrew Lokan

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Waterloo Region



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FightBack is onsite indefinitely

#kitchener #kitchenerevents
#kitchenerwaterloocambridge
#cityofcambridge #cityofwaterloo
#cityofkitchener #cambridge
#waterlooregion #waterlooevents
#waterloo #explorewr
#explorewaterlooregion
#downtownkitchener #dtk #dtklove
#dtkitchener #kwfamous #kw #kwlocal
#kwawesome



98 likes

May 1

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More posts from fightbackkw

This is **Exhibit B** referred to in the Affidavit of Peter Sweeny, affirmed by Peter Sweeny of the City of Cambridge, in the Regional Municipality of Waterloo, before me at the City of Toronto, in the Province of Ontario, on July 2, 2025, in accordance with O. Reg. 431/10, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits (or as may be)

Andrew Lokan

BY-LAW NUMBER 13-050
OF
THE REGIONAL MUNICIPALITY OF WATERLOO

A By-law Respecting the Conduct of Persons Entering Upon
Buildings, Grounds and Public Transportation Vehicles Owned or
Occupied by The Regional Municipality of Waterloo

The Council of the Regional Municipality of Waterloo enacts as follows:

WHEREAS The Regional Municipality of Waterloo owns or occupies certain buildings, grounds and public transportation vehicles for the purpose of carrying out its municipal services;

AND WHEREAS persons, from time to time, enter onto these buildings, grounds and public transportation vehicles and cause physical damage to the premises, disruption to Regional operations or the use and enjoyment of these premises by other persons;

AND WHEREAS it is the desire of The Regional Municipality of Waterloo to create a code of use in regard to these premises;

AND WHEREAS The Regional Municipality of Waterloo has the capacity, rights, powers and privileges of a natural person and the ability to govern its affairs as it considers appropriate pursuant to sections 8 and 9 of the *Municipal Act, 2001*, S.O. 2001, c. 25, as amended;

AND WHEREAS The Regional Municipality of Waterloo has the authority to enact by-laws respecting its public assets and the protection of persons and property pursuant to subsection 11(2) of the *Municipal Act, 2001*, S.O. 2001, c. 25, as amended;

NOW THEREFORE THE COUNCIL OF THE REGIONAL MUNICIPALITY OF WATERLOO ENACTS AS FOLLOWS:

PART I - DEFINITIONS

1. In this By-law:

- (1) **“Designated Personnel”** means those persons listed in Schedule “A” of this By-law;
- (2) **“Designated Premises”** means any public transportation vehicle that is owned or operated by the Region or any building, grounds or other premises, other than a highway or the private residential unit of an individual, that are owned or occupied by the Region;
- (3) **“Director”** means the Director of Facilities Management and Fleet Services or any successor position, or his or her designate;
- (4) **“highway”** means a common and public highway and includes any bridge, trestle, viaduct or other structure forming part of the highway and, except as otherwise provided, includes a portion of a highway;
- (5) **“Municipal Act, 2001”** means the *Municipal Act, 2001*, S.O. 2001, c. 25, as amended, or any successor legislation;
- (6) **“Prohibited Activity”** means any activity that is listed in Schedule “B” of this By-law;
- (7) **“public transportation vehicle”** means a bus or other motor vehicle that is designed to operate on a highway, as well as a train that runs upon rails, wherein passengers are transported for a fee or other consideration;

- (8) **“Region”** means The Regional Municipality of Waterloo;
- (9) **“sign”** means any device, object or thing that creates a design or conveys a message, or that is designed to convey a message and that is placed for the purposes of advertising, announcing, directing or promoting any idea, event, activity, product, service or facility, identifying a business or enterprise, or conveying any other type of message; and
- (10) **“Trespass to Property Act”** means the *Trespass to Property Act*, R.S.O. 1990, c. T.21, as amended, or any successor legislation.

PART II – PROHIBITION

2. No person shall do a Prohibited Activity on Designated Premises.
3. (1) No person shall place, or cause or permit to be placed, a sign, or any part of a sign, on Designated Premises.
- (2) Subsection (1) of this section shall not apply to a sign that is placed at a location that is designated for signs by the Director and the sign meets the following criteria:
 - (a) the sign is less than 1,600 square centimeters in area;
 - (b) the sign does not promote an unlawful activity or discrimination on the basis of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, marital status, family status or disability;
 - (c) the sign does not contain profanity or obscenity; and
 - (d) the sign is not obsolete in relation to a past event or a business or enterprise that is no longer conducted, or an activity, product, service or facility that is not in season or is no longer provided.
4. Every person who contravenes section 2 or 3 of this By-law is guilty of an offence and on conviction is liable to a fine not exceeding \$5,000, exclusive of costs.

PART III - TRESPASS

5. Without limiting Part II of this By-law, Designated Personnel may exercise any of the following enforcement options at Designated Premises when a person is doing or has done a Prohibited Activity:
 - (1) Issue a verbal direction to refrain from a Prohibited Activity;
 - (2) Issue a verbal direction to leave the Designated Premises citing as the reason the failure to refrain from a Prohibited Activity;
 - (3) Serve a written notice upon a person prohibiting a Prohibited Activity citing as the reason the failure of the person to refrain from a Prohibited Activity;
 - (4) Serve a written notice upon a person prohibiting entry upon a Designated Premises citing as the reason the failure of the person to refrain from a Prohibited Activity;
 - (5) Post a sign so that the sign is clearly visible in daylight under normal conditions from the approach to each ordinary point of access to the Designated Premises prohibiting a Prohibited Activity;
 - (6) Post a sign so that the sign is clearly visible in daylight under normal conditions from the approach to each ordinary point of access to the Designated Premises prohibiting entry upon the Designated Premises by a person citing as the reason the failure to refrain from a Prohibited Activity; and
 - (7) Exercise any other rights or powers pursuant to the *Trespass to Property Act* that are reasonable in the circumstances.

6. Any verbal direction, written notice or sign pursuant to section 5 of this By-law shall be reasonable in relation to the conduct prohibited, the breadth of the location and the duration of the time imposed.
7. (1) Any person who is subject to a verbal direction, written notice or sign pursuant to section 5 of this By-law may apply to the Director in writing with a request that the verbal direction, written notice or sign be rescinded or modified.
- (2) Any written request pursuant to subsection (1) of this section shall set out the grounds for the request and shall be submitted to the Director within 30 calendar days of:
 - (a) the person's receipt of the verbal direction or written notice or the person's observance of the sign; or
 - (b) any changed circumstance that relates to the impact of the verbal direction, written notice or sign upon the person.
- (3) Upon the receipt of the written request pursuant to subsection (1) of this section, the Director shall investigate and determine whether the verbal direction, written notice or sign should be rescinded or modified and the Director shall advise the person of his or her decision in writing.
- (4) The verbal direction, written notice or sign that is the subject of a request pursuant to this section shall remain in full effect pending the Director's decision in writing.
8. Designated Personnel may contact the Waterloo Regional Police Service, or any other police service having lawful jurisdiction, at any time to request assistance or to initiate any other action as the police service may deem necessary in the circumstances.

PART IV - GENERAL

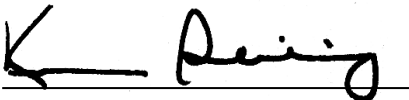
9. This By-law may be enforced by a Designated Personnel or a police officer.
10. (1) The Director shall have all necessary authority to administer this By-law.
- (2) Without limiting subsection (1) of this section, the Director shall have the authority to:
 - (a) prescribe any administrative forms for the purposes of this By-law;
 - (b) designate permitted locations for signs at Designated Premises; and
 - (c) remove, or cause the removal, of any sign that does not meet the requirements of this By-law.
11. This By-law may be cited as the "Code of Use By-law".
12. Any procedural by-law of the Region governing the conduct of any person during a session of Council of the Region, or of a committee of Council of the Region, shall govern and this By-law shall apply with necessary modification.
13. If any section or sections of this By-law or parts thereof are found by any Court to be illegal or beyond the power of Council of the Region to enact, such section or sections or parts thereof shall be deemed to be severable and all other sections or parts of this By-law shall be deemed to be separate and independent therefrom and shall continue in full force and effect unless and until similarly found illegal.
14. (1) By-law 05-055 of The Regional Municipality of Waterloo, A By-law Respecting the Conduct of Persons Using the Public Transit System ("Grand River Transit") Operated by the Regional Municipality of Waterloo, shall be repealed effective on the coming into force and effect of this By-law.
- (2) Notwithstanding subsection (1) of this section, any direction or notice issued to a person pursuant to By-law 05-055 of The Regional

Municipality of Waterloo, A By-law Respecting the Conduct of Persons Using the Public Transit System ("Grand River Transit") Operated by the Regional Municipality of Waterloo, that is in effect at the time that the By-law is repealed shall be deemed to be a direction or notice pursuant to this By-law and shall continue in full force and effect.

15. This By-law shall come into force and take effect on the date of final passage hereof.

By-law read a first, second and third time and finally passed in the Council Chamber in the Regional Municipality of Waterloo this 11th day of December, A.D., 2013.


REGIONAL CLERK


REGIONAL CHAIR

SCHEDULE "A"

DESIGNATED PERSONNEL

1. The following are Designated Personnel:
 - (1) the Director having responsibility for the Designated Premises;
 - (2) an employee of the Region having responsibility for the Designated Premises, or any part thereof, at the particular time;
 - (3) Manager, Business Services, for the Region, or any successor position thereto;
 - (4) Supervisor, Security Services, for the Region, or any successor position thereto;
 - (5) Supervisor, Transit Security for the Region, or any successor position thereto;
 - (6) a municipal law enforcement officer as appointed by the Region;
 - (7) a security guard under contract to the Region; and
 - (8) other persons from time to time as may be designated by Council of the Region.

SCHEDULE "B"

PROHIBITED ACTIVITIES

1. In this Schedule:
 - (1) "authorization" means written permission from the Director for the Region having responsibility for the Designated Premises, or his or her designate;
 - (2) "loitering" means to linger without due cause or purpose;
 - (3) "nuisance" includes any conduct or behavior which interferes with the ordinary enjoyment of persons using Designated Premises; and
 - (4) "service line" means an indoor or outdoor line of two or more persons awaiting service of any kind, regardless of whether or not such service involves the exchange of money, including but not limited to, sales, provision of information, transactions, or advice and transfers of money or goods.
2. The following activities are Prohibited Activities:
 - (1) An activity that obstructs, prevents or hinders the rights of others to use and enjoy Designated Premises or which obstructs, prevents or hinders the operations of the Region or any of its employees, agents or contractors;
 - (2) Without limiting the generality of the foregoing, an activity that obstructs, prevents or hinders the rights of others to use and enjoy the Designated Premises or which obstructs, prevents or hinders the operations of the Region or any of its employees, agents or contractors includes, but is not limited to:
 - (a) smoking tobacco or holding lit tobacco in any elevator or escalator, in any service line, public area or area designated as a "No Smoking" or "Smoke Free" area;
 - (b) committing any nuisance, disturbing the peace or acting contrary to public order;
 - (c) spitting, urinating or otherwise causing unsanitary conditions;
 - (d) littering;
 - (e) loitering;
 - (f) rollerblading or skateboarding without authorization;
 - (g) using profanity, obscene language or racial slurs;
 - (h) vandalizing the Designated Premises or any personal property on the Designated Premises;
 - (i) using, removing or possessing any personal property of the Region or any other person without authorization;
 - (j) selling or attempting to sell, distribute or solicit any good or service without authorization;
 - (k) operating any radio, tape recorder, DVD, CD or MP3 player, musical instrument or similar device, without authorization, unless the sound is conveyed by earphone at a decibel level that does not disturb any other person;
 - (l) operating for commercial purposes any camera, video recording device, movie camera or any similar device without authorization;

- (m) carrying any goods, without authorization, which are offensive, dangerous, toxic, corrosive, flammable or explosive in nature that are likely to alarm, inconvenience, cause discomfort or injure any person, or cause damage to property, whether or not such good are contained in an approved container;
 - (n) bringing any large animal onto the Designated Premises, without authorization, other than during an emergency or for use as a service or guide animal;
 - (o) entering, without authorization, onto the Designated Premises without a shirt or footwear;
 - (p) bringing a small animal or bird, without authorization, that is not in a cage or carrying device designed for secure and safe transport unless the small animal or bird is required for use as a service or guide animal;
 - (q) acts which are perceived as threatening, intimidating or sexual harassment;
 - (r) entering, without authorization, any area that is designated or used as a work area for an employee;
 - (s) interfering with an operator of a public transportation vehicle or obstructing his or her vision;
 - (t) erecting, without authorization, any structure, tent or temporary shelter;
 - (u) consuming alcohol without authorization;
 - (v) riding or standing on any exterior portion of a public transportation vehicle or leaning out of or projecting any body part through any window of a public transportation vehicle;
 - (w) projecting a body beyond the edge of any platform for a public transportation vehicle, except to enter or leave the vehicle;
 - (x) riding a bicycle on any platform for a public transportation vehicle; and
 - (y) any activity contrary to the *Criminal Code of Canada*, R.S. 1985, c. C-46, as amended, other federal statutes, provincial statutes or municipal by-laws;
- (3) Acts which are contrary to any specific rules or terms of use for the Designated Premises provided that the specific rules or terms of use have been posted in a conspicuous location at the Designated Premises;
 - (4) Entering Designated Premises without paying the required fee or fare or having proof of payment for the required fee or fare for admission to the Designated Premises;
 - (5) Failing to comply with the terms and conditions of any pass, transfer or other instrument that is required for the entrance or use of Designated Premises; and
 - (6) Entering a public transportation vehicle at other than a designated passenger entrance.

By-Law Number 18-056

of

The Regional Municipality of Waterloo

A By-law to Amend By-law 13-050, A By-Law Respecting the Conduct of Person Entering Upon Buildings, Grounds and Public Transportation Vehicles Owned or Occupied by The Regional Municipality of Waterloo

Whereas

The Council of The Regional Municipality of Waterloo enacts as follows:

1. Subsection 1(2) of By-law 13-050, A By-Law Respecting the Conduct of Person Entering Upon Buildings, Grounds and Public Transportation Vehicles Owned or Occupied by The Regional Municipality of Waterloo (the “By-law”), is repealed and replaced with the following:

(2) “Designated Premises” means: (a) any public transportation vehicle that is owned or operated by the Region; (b) any bus stop, bus shelter and light rail transit station that is used for the purposes of the Region’s bus or light rail transit system; and (c) any building, grounds or other premises that are owned or occupied by the Region other than a highway or the private residential unit of an individual;

2. Subsection 1(4) of the By-law is repealed and replaced with the following:

(4) “highway” means a common and public highway and includes any bridge, trestle, viaduct or other structure forming part of the highway and, except as otherwise provided, includes a portion of a highway. For the purposes of this By-law, a bus stop, bus shelter and light rail transit station that is used for the purposes of the Region’s bus or light rail transit system shall not be deemed part of a highway;

3. Section 1 of Schedule “B” of the By-law is repealed and replaced with the following:

1. In this Schedule:

- (1) “authorization” means written permission from the Director for the Region having responsibility for the Designated Premises, or his or her designate;
- (2) “loitering” means to linger without due cause or purpose;
- (3) “medical cannabis” means cannabis that is obtained for medical purposes in accordance with applicable federal law;
- (4) “nuisance” includes any conduct or behavior which interferes with the ordinary enjoyment of persons using Designated Premises; and
- (5) “smoking” includes vaping and the use of electronic cigarettes.

4. Subsection 2(2)(a) of Schedule “B” of the By-law is repealed and replaced with the following:

(a) smoking tobacco or medical cannabis or holding lit tobacco or medical cannabis in any building, at any bus stop, bus shelter or light rail transit station, or any area designated as “No Smoking” or “Smoke Free”, on a Designated Premises;

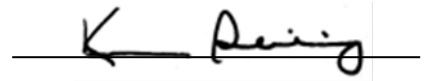
5. Subsection 2(2) of Schedule “B” of the By-law is amended to add the following:

(a.1) smoking cannabis or holding lit cannabis, either of which is not medical cannabis, save and except for areas at a community housing complex or Sunnyside Home that are designated and marked as cannabis smoking areas;

By-law read a first, second and third time and finally passed in the Council Chamber in the Regional Municipality of Waterloo this 14th day of November, A.D., 2018.



Regional Clerk



Regional Chair

By-Law Number 23-041

of

The Regional Municipality of Waterloo

A By-law to amend By-law 13-050, A By-Law Respecting the Conduct of Persons Entering Upon Buildings, Grounds and Public Transportation Vehicles Owned or Occupied by The Regional Municipality of Waterloo, as amended

Whereas Council of The Regional Municipality of Waterloo enacted By-law 13-050, A By-Law Respecting the Conduct of Persons Entering Upon Buildings, Grounds and Public Transportation Vehicles Owned or Occupied by The Regional Municipality of Waterloo, as amended (the “By-law”);

And Whereas the Council of The Regional Municipality of Waterloo wishes to prevent harassing behavior on Regional premises;

NOW THEREFORE the Council of The Regional Municipality of Waterloo enacts as follows:

- 1. Section 1 of Schedule “B” of the By-law is amended by adding subsections (1.1) and (1.2) as follows:

“(1.1) “communicating” and “communication” includes but is not limited to words spoken, written, or recorded electronically or electro-magnetically or otherwise as well as gestures, signs or other visible representations;”

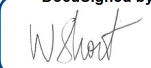
“(1.2) “harassed” includes, but is not limited to:
(a) experiencing objectionable or unwelcome conduct, comment, bullying, or actions that could reasonably cause offence or humiliation, including conduct, comment, bullying, or actions because of race, religious beliefs, colour, disability, age, ancestry, place of origin, marital status, source of income, family status, gender, gender identity, gender expression, sexual orientation, socio-economic status or housing status;”

- 2. Subsection 2(2) of Schedule “B” of the By-law is amended to add the following subsection (h.1):

“(h.1) communicating with any person in a way that, reasonably in the circumstances, constitutes harassment, subject to the provision that nothing in this subsection shall prevent or limit a lawful protest;”

- 3. This By-law shall come into force and take effect on January 1, 2024.

By-law read a first, second and third time and finally passed in the Council Chamber in the Regional Municipality of Waterloo this 27th day of September, A.D., 2023.

DocuSigned by:

B905693728FF4C7...

Regional Clerk

DocuSigned by:

E732ACEE5B224A9...

Regional Chair

This is **Exhibit C** referred to in the Affidavit of Peter Sweeny, affirmed by Peter Sweeny of the City of Cambridge, in the Regional Municipality of Waterloo, before me at the City of Toronto, in the Province of Ontario, on July 2, 2025, in accordance with O. Reg. 431/10, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits (or as may be)

Andrew Lokan

April 22, 2025

- <https://www.facebook.com/share/p/16Lf3D6XbM/>

 Ryan Pettipiere, Waterloo Region's Director of Housing Services • Prepared the report and subsequent by-law • Worked for the Region of Waterloo since July 2019 • Salary increase of more than \$10,000 every year • Will make \$196,976.50 in 2025.	 Peter Sweeney, Waterloo Region's Commissioner of Community Services • Reviewed the report and by-law • Worked for the Region since 2022 • Yearly salary increases sometimes up to \$100,000. • Will make \$253,700.30 in 2025.
 Fiona McCrea, Waterloo Region's Acting Regional Solicitor and Director of Legal Services • Instrumental to writing the by-law • Worked for the Region of Waterloo since 2011 • Receives a salary increase of nearly \$10,000 since 2020 • Will make \$177,932.75 this year.	 Doug Spooner, Waterloo Region's Director of Transit Services • Approved the report and by-law • Not a resident of Waterloo Region • Worked for the Region of Waterloo since April 2024 • Was a Director at Metrolinx 2019-2023 • Salary increase of more than 50,000 last year • Will make \$208,573.82 in 2025.
 Jennifer Rose, Waterloo Region's Commissioner of Engineering and Environmental Services. • Approved this by-law. • Worked for the Region since 2022. • Received a salary increase of more than \$20,000 last year. • Will make \$241,650.79 in 2025.	 Rod Regier, Waterloo Region's Commissioner of Planning, Development, and Legislative Services. • Approved the report and by-law. • Worked for the Region since 2016. • Receives a salary increase of nearly \$15,000 nearly every year. • Will make \$261,343.63 this year.
Running total: \$374,909.25	Running total: \$837, 183.37
Running total: \$1,340,177.79	

This is **Ryan Pettipiere** The Director of Housing Services in the Region of Waterloo



Between 2020 and 2023, Ryan got got \$24,393.77 worth in raises!!

That's enough money to keep the hydro and utilities going in 6 homes for a year.

Stop Stealing from our community

fightbackkw
fightbackkw If Ryan Pettipiere won't review the shelter system and make the changes necessary to make it safe and accessible, what are we paying him for?
Link in bio
100w

Liked by goldiesconvenience and 52 others
July 12, 2023

Add a comment... Post

This is **Bruce Lauckner** The Chief Administration Officer for the Region of Waterloo



Between 2020 and 2023, Bruce got \$201,211.12 worth in raises!!

That's enough money to give 10 people a 1 bedroom apartment for a year.

Stop Stealing from our community

fightbackkw
fightbackkw Link in bio for more info
100w

Liked by justinrogersphotography2.0 and 62 others
June 30, 2023

Add a comment... Post

This is **Exhibit D** referred to in the Affidavit of Peter Sweeny, affirmed by Peter Sweeny of the City of Cambridge, in the Regional Municipality of Waterloo, before me at the City of Toronto, in the Province of Ontario, on July 2, 2025, in accordance with O. Reg. 431/10, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits (or as may be)

Andrew Lokan

-----Original Message-----

From: Andrew Lokan

Sent: Tuesday, April 29, 2025 3:06 PM

To: 'Ashley Schuitema (WRCLS)' <ashley.schuitema@wrcls.clcj.ca>

Cc: Gordon Capern <Gordon.Capern@paliareroland.com>; Kartiga Thavaraj <kartiga.thavaraj@paliareroland.com>; Joanna Mullen (WRCLS) <j Joanna.mullen@wrcls.clcj.ca>; Shannon Down <shannonkdown@gmail.com>; Sanja Bistricki <Sanja.Bistricki@paliareroland.com>

Subject: RE: [EXTERNAL] PDL-LEG-25-017, 100 Victoria Street, North, Kitchener – Site Specific By-Law

Dear Ms. Schuitema:

The Region is not aware of WRCLS staff being denied access yesterday. I understand that specific instructions have been given to Security to allow Clinic staff access the site when they identify themselves. Can you advise whether Clinic staff did actually identify themselves and if so, whether they were not permitted access? As a general comment, Clinic Staff could perhaps provide advance notice of when they plan to attend along with their name(s) and a description of the vehicle to make access easier and quicker.

I understand that the Region is continuing to follow upon the parking ticket issue and will respond further. Tickets should not be issued if the Region is directing people to park at 84 Victoria to visit the site. We wonder if it is possible that someone parked at 70 Victoria instead which might have led to problems.

As you are likely aware the Region has placed a small site trailer at 100 Victoria to provide space for outreach workers to meet privately with residents. I am advised that the Region can make that trailer available for use by WRCLS staff to meet with clients to save lugging tables, chairs, etc. into the site each time they have a client meeting, if WRCLS staff can provide advance notice of their meetings/appointments so the Region can schedule use of the trailer appropriately. This would need to be coordinated so it does not clash with the Region's needs.

Regards, Andrew

-----Original Message-----

From: Ashley Schuitema (WRCLS) <ashley.schuitema@wrcls.clcj.ca>

Sent: Tuesday, April 29, 2025 9:40 AM

To: Andrew Lokan <Andrew.Lokan@paliareroland.com>

Cc: Gordon Capern <Gordon.Capern@paliareroland.com>; Kartiga Thavaraj <kartiga.thavaraj@paliareroland.com>;

Joanna Mullen (WRCLS) <joanna.mullen@wrcls.clcj.ca>; Shannon Down <shannonkdown@gmail.com>

Subject: RE: [EXTERNAL] PDL-LEG-25-017, 100 Victoria Street, North, Kitchener – Site Specific By-Law

Importance: High

Dear Mr. Lokan:

I'm not trying to be difficult but I hope you can understand that when we attend the site we are meeting with our clients to sign retainers, draft affidavits, etc. That means we are bringing folding tables, chairs, sun shades, clipboards, water, and the list goes on. Having clients that live at an encampment is already an incredibly difficult challenge and not having vehicle access to the site is making it more difficult. It means we have to lug all these things from the parking lot to the site.

I was told last night that if Dispatch was given the name of our organization we would be allowed vehicle access.

Additionally, last week when I attended and left my vehicle at the small parking area at 84 Victoria I received a parking ticket.

This is all unacceptable and making accessing our clients more difficult than necessary. Can you please re-consult with your client on this as urgently as possible.

Ashley

-----Original Message-----

From: Andrew.Lokan@paliareroland.com <Andrew.Lokan@paliareroland.com>

Sent: April 28, 2025 8:01 PM

To: Ashley Schuitema (WRCLS) <ashley.schuitema@wrcls.clcj.ca>

Cc: Gordon.Capern@paliareroland.com; kartiga.thavaraj@paliareroland.com

Subject: Re: [EXTERNAL] PDL-LEG-25-017, 100 Victoria Street, North, Kitchener – Site Specific By-Law

This message was sent from outside of Legal Aid Ontario. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Ms. Schuitema:

I have been unable to respond to this before this evening, because I have been in discoveries all day (continuing tomorrow) and because I needed information from Region staff. I am advised as follows:

The security personnel park their vehicle in the access to limit/monitor vehicular access to the property so that there aren't too many cars that would impede emergency access or access for servicing the site. People who were dropping off supplies were directed to the small parking area at 84 Victoria owned by the Region to park while they unload. In terms of the WRCLS staff attending to speak with residents/clients they can identify themselves as from the WRCLS and the security person will let them park on the site to access their clients.

I trust this addresses your concerns outlined below.

Regards, Andrew Lokan

Sent from my iPad

On Apr 28, 2025, at 8:16 AM, Ashley Schuitema (WRCLS) <ashley.schuitema@wrcls.clcj.ca> wrote:

Good Morning Mr. Lokan and Mr. Capern:

Our legal team needs vehicle access to the site. There is a security vehicle blocking vehicle access to the site 24/7. We have a staff member that uses a cane and there is no where close by to park. We need to be able to drive on site and access our clients.

Additionally, over the weekend I received reports about medical issues related to residents where access to the site was denied by security, as well as community members trying to drop off food and supplies and being denied access. We are asking you to instruct security to move their vehicle that is blocking access to the site until our motion can be heard and decided.

Ashley

From: Fiona McCrea <FMcCrea@regionofwaterloo.ca>

Sent: April 25, 2025 4:23 PM

To: Ashley Schuitema (WRCLS) <ashley.schuitema@wrcls.clcj.ca>

Cc: Joanna Mullen (WRCLS) <joanna.mullen@wrcls.clcj.ca>; Shannon Down <shannonkdown@gmail.com>;

Andrew.Lokan@paliareroland.com; 'Gordon.Capern@paliareroland.com' <Gordon.Capern@paliareroland.com>

Subject: RE: PDL-LEG-25-017, 100 Victoria Street, North, Kitchener – Site Specific By-Law

This message was sent from outside of Legal Aid Ontario. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Good Afternoon Ms. Schuitema

Thank you for your message and letter.

The Region's external legal counsel, Paliare Roland LLP, will be responding to your letter.

Thank you,

Fiona

Fiona M. McCrea

Acting Regional Solicitor & Director, Legal Services The Regional Municipality of Waterloo

Mobile: (519) 502-0925

Telephone: (519) 575-4518

Fax: (519) 575-4466

Email: fmccrea@regionofwaterloo.ca<mailto:fmccrea@regionofwaterloo.ca>

From: Ashley Schuitema (WRCLS) <ashley.schuitema@wrcls.clcj.ca<mailto:ashley.schuitema@wrcls.clcj.ca>>

Sent: April 25, 2025 11:55 AM

To: Fiona McCrea <FMcCrea@regionofwaterloo.ca<mailto:FMcCrea@regionofwaterloo.ca>>

Cc: Joanna Mullen (WRCLS) <joanna.mullen@wrcls.clcj.ca<mailto:joanna.mullen@wrcls.clcj.ca>>; Shannon Down <shannonkdown@gmail.com<mailto:shannonkdown@gmail.com>>

Subject: PDL-LEG-25-017, 100 Victoria Street, North, Kitchener – Site Specific By-Law

CAUTION! EXTERNAL SENDER

Were you expecting this email? TAKE A CLOSER LOOK. Is the sender legitimate?
DO NOT click links or open attachments unless you are 100% sure that the email is safe.

Dear Ms. McCrea,

Please find attached correspondence related to the Region's Site Specific By-Law.

I've cc'd my colleagues on this email, Ms. Mullen and Ms. Down and ask that they be copied on any future correspondence.

Regards,

Ashley

[image001.png]

My work day may look different than your work day. Please do not feel obligated to respond out of your normal working hours.

Ashley Schuitema B.A., J.D. (she/her)

Executive Director

Phone: (519) 743-0254 | Fax: (519) 743-1588

Address: 450 Frederick St #101, Kitchener, ON N2H 2P5

www.wrcls.ca

Waterloo Region Community Legal Services acknowledges with gratitude and respect that our work takes place on the traditional territory of the Anishinaabe, Haudenosaunee & Chonnonton Peoples. We are thankful to the First Nations, Metis & Inuit people who have cared for this land historically and presently.

The information contained in this e-mail message may be privileged, confidential and protected from disclosure. If you are not the intended recipient, any use, disclosure, dissemination, distribution or copying of any portion of this message or any attachment is strictly prohibited.

This is **Exhibit E** referred to in the Affidavit of Peter Sweeny, affirmed by Peter Sweeny of the City of Cambridge, in the Regional Municipality of Waterloo, before me at the City of Toronto, in the Province of Ontario, on July 2, 2025, in accordance with O. Reg. 431/10, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits (or as may be)

Andrew Lokan

May 2, 2025

Gordon Capern & Andrew Lokan
Paliare Roland Rosenberg Rothstein LLP
155 Wellington Street West, 35th Floor
Toronto, ON M5V 3H1

Via Electronic Mail

gordon.capern@paliareroland.com
andrew.lokan@paliareroland.com

Dear Mr. Capern and Mr. Lokan

RE: Encampment at 100 Victoria St. North, Kitchener

Yesterday afternoon members of WRCLS staff and I attended the encampment referenced above. While we were present, there was a drug poisoning suffered by one of the residents.

Emergency services were called, but access to the encampment was blocked by the onsite security services vehicle. The positioning of the vehicle is a recent change, as it had been routinely parked in the parking lot directly west of the encampment since 2022. The ambulance was forced to park on the road, delaying emergency treatment to the victim.

In situations like this, seconds count. Tragically, this individual died yesterday.

We ask that you please urgently speak to your client about their directive to the security service to block the driveway into the encampment with their vehicle.

Yours very truly,
WATERLOO REGION COMMUNITY LEGAL SERVICES



Ashley Schuitema
Executive Director

Paliare Roland

Andrew Lokan
Paliare Roland Rosenberg Rothstein LLP
155 Wellington St. West, 35th Floor
Toronto, ON M5V 3H1

andrew.lokan@paliareroland.com
T. 416.646.4324 / F. 416.646.4301

File # 102678

May 2, 2025

Via Email

Ashley Schuitema
Executive Director
Waterloo Region Community Legal Services
Kitchener – Main Office
450 Frederick Street, Unit 101
Kitchener, ON N2K 2P5

Dear Ms. Schuitema:

Re: 100 Victoria St. North Encampment

Thank you for your letter of today's date.

While information is only preliminary at this stage, the facts do not appear to be as you have described them.

Region Staff were very saddened to learn of the death of an individual at the encampment yesterday. Region Staff were present to support those at the encampment at the time, and in fact Region Security called Emergency Services when the individual was discovered to be in an unresponsive state.

Paramedic services provided an immediate response to the call and were able to access the site with no delay, as has always been the case

While it cannot be confirmed at this time that the individual suffered a drug poisoning as you suggest, the Region continues to be concerned about the safety of the encampment environment.

Paliare Roland

The Region understands that Waterloo Region Community Legal Services (“WRCLS”) has put out a media statement that sets out the same incorrect recital of facts as your letter, without having taken any steps to verify its accuracy. This is troubling. We trust that this will not be repeated in future.

Yours very truly,
Paliare Roland Rosenberg Rothstein LLP



Andrew Lokan
AL:SB

THE REGIONAL MUNICIPALITY OF WATERLOO
Applicant

-and- PERSONS UNKNOWN AND TO BE ASCERTAINED
Respondents

**ONTARIO
SUPERIOR COURT OF JUSTICE**

PROCEEDING COMMENCED AT
WATERLOO REGION

2ND AFFIDAVIT OF PETER SWEENEY

Paliare Roland Rosenberg Rothstein LLP

155 Wellington Street West
35th Floor
Toronto ON M5V 3H1

Gordon Capern (LSO # 32169H)

Tel: 416.646.4311
Email: gordon.capern@paliareroland.com

Andrew Lokan (LSO # 31629Q)

Tel: 416.646.4324
Email: andrew.lokan@paliareroland.com

Kartiga Thavaraj (LSO # 75291D)

Tel: 416.646.6317
Email: kartiga.thavaraj@paliareroland.com

Greta Hoaken (LSO # 87903I)

Tel: 416.646.6357
Email: greta.hoaken@paliareroland.com

**Lawyers for the Applicant,
The Regional Municipality of Waterloo**

Court File No. CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

and

PERSONS UNKNOWN AND TO BE ASCERTAINED

Respondents

AFFIDAVIT OF BRENT WOOD

I, Brent Wood, of the City of Waterloo, in the Regional Municipality of Waterloo,
AFFIRM:

1. I am a paramedic with the Region of Waterloo Paramedic Services (the “**PSV**”). The PSV is the medical emergency response team of the Regional Municipality of Waterloo (the “**Region**”). As such, I have knowledge of the matters to which I depose below. Where my knowledge is based on information and belief, I indicate the source, and believe it to be true.
2. I have worked as a paramedic with the PSV since May 2024.
3. I was one of two responding PSV paramedics who attended a 911 call to 100 Victoria Street North, Kitchener (“**100 Vic**”), on May 1, 2025. There is an encampment of unhoused people at 100 Vic (the “**Encampment**”).

4. I was the attending paramedic on this call, meaning that I was in the passenger seat of our ambulance. My partner on the call – who was driving the ambulance – is another paramedic named Jake Maas.

5. We received the call from the Encampment at approximately 12:25 pm on May 1. At that time, Mr. Maas and I were located only a few minutes' drive from the Property.

6. We set out promptly to attend the call, and Mr. Maas and I arrived by ambulance at 100 Vic at or about 12:27 pm.

7. When we arrived, we pulled up to the curb at the edge of 100 Vic to park the ambulance. As the driver of the ambulance, Mr. Maas made the decision about where to park. His decision to park at the curb was not out of the ordinary or remarkable to me at the time.

8. On this occasion, there was a security vehicle at the front of the Encampment. We did not see any need to ask that the vehicle be moved, or to drive onto 100 Vic.

9. I understand from speaking to Mr. Maas, who has attended calls at the Encampment before, that on his previous calls the ambulance has been parked at the curb – regardless of whether a security vehicle was present. The Encampment is crowded with tents and people. Driving through the crowded Encampment could present a hazard, and one would need to drive very slowly to avoid risk. Potentially, it would also be necessary to turn the vehicle around or back out to transport a patient to urgent care. In approaching scenes, our general paramedic training has taught us to park to be prepared

for egress and transportation. The decision to park at the curb was based on this approach, and I do not believe that it cost us any time.

10. If I had been driving the ambulance that day, I would have also parked at the curb, for these reasons.

11. Also, when we arrived we did not know where the patient was located within 100 Vic. The patient could have been located adjacent to the curb, or at or near the back, or anywhere in between. In any case, 100 Vic is not a large property and we could reach any part of it quickly on foot. As paramedics, we are trained to move quickly when needed.

12. After arriving at 100 Vic, we were directed by other individuals present towards the tent where the patient was located. This tent was along the back wall of the Encampment.

13. We unloaded the stretcher and carried no more than 50 metres from the ambulance to the tent in question. There was no delay in reaching the patient, arising from the security vehicle or otherwise.

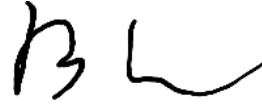
14. When we reached the tent to which we were directed, I went inside and examined the patient. I noted that he did not have a pulse, was cool to the touch, and met the criteria for being obviously deceased. I cannot say for certain how long the patient had been deceased, but my estimate at the time was at least several hours. Mr. Maas also examined the patient and made the same determination.

AFFIRMED by Brent Wood of the City of Waterloo, in the Regional Municipality of Waterloo, before me at the City of Toronto, in the Province of Ontario, on June 26, 2025, in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits
(or as may be)

GRETA HOAKEN
(LSO # 87903I)



Brent Wood

THE REGIONAL MUNICIPALITY OF WATERLOO
Applicant

-and-

Court File No. CV-25-00000750-0000
PERSONS UNKNOWN AND TO BE ASCERTAINED
Respondents

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT
WATERLOO REGION

AFFIDAVIT OF BRENT WOOD

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Greta Hoaken (LSO # 87903I)
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Email: greta.hoaken@paliareroland.com

Lawyers for the Applicant,
The Regional Municipality of Waterloo

Court File No. CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

and

PERSONS UNKNOWN AND TO BE ASCERTAINED

Respondents

AFFIDAVIT OF PETER SWEENEY

I, Peter Sweeney, of the City of Cambridge, in the Regional Municipality of Waterloo, AFFIRM:

1. I am the Commissioner of Community Services for the Applicant, the Regional Municipality of Waterloo (the “**Region**”). As such, I have knowledge of the matters to which I depose below. Where my knowledge is based on information and belief, I indicate the source, and believe it to be true.

A. My Background

2. I have served as the Region’s Commissioner of Community Services since June 2022.

3. Prior to holding this role, I served as the Chief Executive Officer of the YMCA of Three Rivers for approximately 2 years (2020-2022), and as Chief Executive Officer of the YMCAs of Cambridge & Kitchener-Waterloo for approximately 4 years (2016-2020). From 2010 to 2016 I was President of the International Outreach Program at St. Joseph’s

Health System, and from 2001 to 2016 I was President of the St. Mary's General Hospital Foundation.

4. I hold a Master of Business Administration from Wilfrid Laurier University, a Public Relations Certificate from Humber College, and a B.A. in Political Science from University of Waterloo.

5. My professional focus over the past two decades has been on providing health and social services through facilitating social programs, and I have worked to achieve this end through various roles in the public and non-profit sectors.

6. In my current role at the Region, I have experience interacting directly with those experiencing homelessness, addiction, and mental health challenges and with staff and partners who implement programs and services to support the unhoused. I have also worked with allies of those who receive these health and social services (including organizations advocating for members of these groups).

B. My Responsibilities as Commissioner

7. My role as Commissioner includes leading various community and social programs that aim, among other things, to combat homelessness and poverty within the Region. The contents of this affidavit are informed by what I have seen firsthand as Commissioner and what I have been informed of by virtue of my status in this role. My knowledge of homelessness and related social challenges as larger concepts as detailed in this affidavit is in large part informed by my various experiences working in this area.

8. In 2024, the Region adopted the Plan to End Chronic Homelessness (the “**PECH**”) as part of its efforts to address homelessness and its associated social challenges. I was personally involved in the development of the PECH and remain involved in its implementation as we move forward.

9. I attach as **Exhibit A** the final report associated with the PECH, which is entitled “Navigating Complexity Together: A Roadmap to Functional Zero by 2030”. This report outlines the PECH and many of the Region’s related actions. As it explains, the Region remains committed to maintaining a human rights approach to housing and homelessness, which recognizes the agency of those experiencing homelessness and the duties that the Region has to these individuals.¹ I will provide further information in relation to the PECH below.

10. As Commissioner, my responsibilities at the Region include leading a department of 811 full-time equivalent employees with an operating budget of \$591 million.

11. I am also accountable for the delivery of social and community services to approximately 673,910 residents across Waterloo Region. These departmental services include Employment & Income Support, Children’s Services, Senior’s Services, Housing & Homelessness, the Waterloo Region Immigration Partnership, and a central support division focussed on strategy, performance, and partnerships.

¹ “Chronic homelessness” refers to homelessness experienced by an individual for prolonged periods of time. The Region uses a definition of chronic homelessness that captures experiences of homelessness lasting a total of at least six months (180 days) over the past year or a total of at least 18 months (546 days) over the past three years.

C. *Unsheltered Support Workers and Individualized Housing Plans*

12. Included in the team I lead is a group of Unsheltered Support Workers (“**USW**”), all of whom are licensed professionals. This team of USWs assists unhoused individuals with accessing accessible short- and long-term housing.

13. The core work of the Region’s team of USWs is the development and implementation of individualized housing plans (“**IHP**”) for – and in collaboration with – unhoused individuals.

14. IHPs are personalized action plans that are designed to match individuals with housing options which reflect their specific needs and preferences, to the greatest extent possible. IHPs are an important recognition of the fact that housing needs can be idiosyncratic to individuals experiencing homelessness. In my experience, and the experience of the Region’s USWs, there is no “one size fits all” solution to homelessness.

15. In developing an IHP, the USW will consider how an individual initially became unhoused, the specific factors in that individual’s life which have prevented them from accessing housing, and the needs and preferences of that individual in accessing housing. Based on these considerations, USWs will work with unhoused individuals and housing providers to match the individual with appropriate housing to the greatest extent possible.

16. This approach recognizes and is rooted in the understanding that homelessness is a complex social problem. Homelessness is widely understood to be caused by a confluence of factors, including the (un)availability of economic opportunity/employment

rates, mental health challenges, substance abuse disorder, the availability of adequate social assistance, and many other personal and societal conditions. As the causes of homelessness are individual and multifaceted, so too are IHPs.

17. IHPs are best developed over time – often weeks or months – as individuals and USWs interact, build trust, and identify the barriers to entry that are specific to that individual. It is therefore vital that USWs have the necessary time and access to unhoused individuals to develop IHPs that appropriately fit their needs.

18. IHPs also recognize that individuals experiencing homelessness commonly require staged approaches to reintegration into more permanent forms of housing, and those staged approaches commonly rely on the individual also receiving concurrent care and treatment from health care providers, addictions specialists and social workers.

19. For example, a first step can be to assist an individual who is living rough, including in an encampment, into the Region's shelter system, and from there into more permanent forms of housing through accessing rent subsidies and other resources that are available through the Region.

D. The Encampment and the Property

20. The USWs on my team provide services to all unhoused individuals in the Region, including residents of the encampment at 100 Victoria Street North (the "**Encampment**", described in greater detail below). The team has been working continuously with Encampment residents on developing IHPs for them and will continue to do so.

21. This team of USWs are in regular contact with Encampment residents and work hard to build relationships and trust with these individuals. I receive reports from this team, interact with them regularly, and I also visit the Encampment with them from time to time.

22. The Encampment is located on a Region-owned parcel of land located at 100 Victoria Street North, on the corner of Victoria and Weber Streets in downtown Kitchener (the “**Property**” or “**100 Vic**”).

23. The Property is approximately one half-acre in size, and it consists of a lot without permanent structures. It is located in close proximity to the VIA Rail Train Station (the services at which include GO trains / a GO bus transfer station and a Region owned parking lot for transit customers) to the east, a commercial plaza and small parking lot, municipally known as 70 and 84 Victoria Street North respectively, directly to the west, a Metrolinx owned rail corridor to the north, and businesses and a church to the south.

24. Since approximately December 2021, the Property has been the site of an encampment of unhoused individuals. Individuals at the Encampment have been living on the Property and have erected tents on the site.

25. The number and identity of people residing in the Encampment has varied since December 2021. On April 16th of this year, there were approximately 40 people regularly residing at the Property and approximately 23 tents counted by security personnel that day.

26. As it then existed, the Encampment was the subject of a decision by the Superior Court of Justice in 2023 (the “Persons Unknown Decision”). In *The Regional Municipality of Waterloo v. Persons Unknown and to be Ascertained*, 2023 ONSC 670, the Court considered the Region’s position that the homeless persons who have erected shelters and are living on the Property are in breach of By-Law number 13-050, *A By-Law Respecting the Conduct of Persons Entering Upon Buildings, Grounds and Public Transportation Vehicles Owned or Occupied by the Region* (the “**Code of Use By-Law**”). The Court held as follows with respect to the Code of Use By-Law:

[157] I declare pursuant to section 52(1) of the *Constitution Act, 1982*, that the By-Law violates section 7 of the *Charter* in that it deprives the homeless residents of the Encampment of life, liberty and security of the person in a manner not in accordance with the principles of fundamental justice and is not saved by section 1 of the *Charter*.

[158] I declare that the By-Law is inoperative insofar, and only insofar, as it applies to prevent the residents of the Encampment from living on and erecting temporary shelters without a permit on the Property when the number of homeless persons exceeds the number of available accessible shelter beds in the Region.

[159] Finally, I order that the Region may apply to terminate my declaration upon it being in a position to satisfy this Court that the By-Law no longer violates the section 7 rights of the Encampment residents.

27. Since the Persons Unknown Decision, the Region has continued to provide services to the residents of the Encampment, as described in more detail below.

E. The Site-Specific By-law at Issue in This Application

28. Recently, Metrolinx has informed the Region that it requires the Property as part of its project to construct improvements to railway infrastructure in its abutting corridor.

Metrolinx's improvements project is the first step in the Region's plans to develop the Kitchener Central Transit Hub ("**KCTH**"), as set out in more detail in the Affidavit of Doug Spooner, to be filed. I am advised by Mr. Spooner that the Property is required by Metrolinx for construction of its works from and after March 2026, and that this in turn requires the Region to have vacant possession of the Property by December 1, 2025, so that site remediation measures can be put in place prior to construction.

29. On April 16, 2025, the Region provided public notice that it would be considering a proposed new bylaw – Bylaw 25-021 – at its Council meeting to be held on April 23, 2025 (the "**By-law**"). I understand that the Bylaw is the subject of the underlying Application in these proceedings.

30. By-Law 25-021 is not the same as the general Code of Use By-Law previously at issue in the Persons Unknown Decision. Rather, it is a site-specific By-Law that:

- (a) Has the specific purpose of providing for vacant possession of the Property by December 1, 2025, when such possession is required by the Region to facilitate construction of the KCTH;
- (b) Is intended to respect the *Charter* rights of those persons who were residing at the Encampment as of the date that public notice of the By-Law was provided ("**Existing Residents**"); and

- (c) Is accompanied by a plan funded by additional resources to provide accessible housing solutions to the Existing Residents in a manner consistent with the Region's PECH.

31. I attach a copy of By-law 25-021 as **Exhibit B**.

32. I attach a copy of the Report to Council that accompanied By-law 25-021 as **Exhibit C**.

33. The By-law did not originate from the Community Services team, and my team is not responsible for enforcing it. However, I was consulted in the drafting of the By-law given its intersection with my team's efforts to assist residents of the Encampment.

34. Throughout these consultations, I emphasized that additional resources should be allocated to support my team's work with Encampment residents, which includes helping Encampment residents find alternate opportunities to access housing. I also emphasized that the By-law should contain mechanisms to help ensure the continued safety of those residing at 100 Vic prior to the By-law's enactment. As I will describe in more detail below, those additional resources and safety mechanisms were indeed put into place with the enactment of the By-law.

F. The Region's Specific Plan for the Existing Residents of the Encampment

35. I understand that the Region requires vacant possession of 100 Vic (by December 1, 2025), to facilitate construction of the KCTH. In this context, and on an interim basis, the Region has developed its specific Plan for the Existing Residents (the "**Plan**").

36. The Plan entails the development and implementation of IHPs for Existing Residents between now and November 30, 2025, such that alternative housing arrangements will be made available to all Existing Residents by that date. My team will avail itself of the additional resources provided by the By-law as may be needed to meet that objective.

37. As is the regular practice for my team, over the next several months leading up to December 1, 2025, the Region's USW team will work with the Existing Residents to explain the available housing and shelter options and attempt to match these options with Existing Residents' individual housing needs and preferences through developing tailored IHPs. Regional staff will work one-on-one with Existing Residents to identify their unique needs and preferences and to build an appropriate housing plan for each individual.

38. We expect these housing plans for some individuals will be staged, meaning they may require several supportive steps before being able to live independently. My team is acutely aware that not every person is ready to transition into long-term housing, for a variety of reasons, and that each IHP needs to meet the individual where they are at in their lives.

39. Shorter-term options involve alternate sheltering or accommodation with social supports. These options include accessing shelters and Region-funded spaces in motels, as I will describe in more detail below. These options will be provided to Existing Residents who have not yet been placed in longer-term housing once they choose to leave or can no longer remain at the Encampment.

40. In the longer term, options include placement in supportive housing units and scattered site rent supplements with social supports.

41. To allow for the Plan to be implemented successfully, allocated resources were needed for the Region's existing system to ensure that the Existing Residents have a place to go and are offered suitable options for their specific needs. To that end, the Region has made an additional \$814,333 in net new funding available to provide additional accommodation options, such as those I have noted above.

42. New resources allocated by Regional Council can be used for supportive housing units, affordable housing units, and/or motels with social supports for a transitional period. The additional resources allocated to this work will augment the existing resources in the housing stability system.

43. Regional staff will work across that system to create opportunities for Existing Residents in the Encampment. To be clear, this could mean that resources may be used to move an individual currently residing in transitional housing (i.e., not an Existing Resident of the Encampment) into affordable housing, which would then free up a space for an Existing Resident to be taken up in a manner consistent with their IHP.

44. I am pleased to report that from April 16, 2025 to June 5, 2025, eleven Existing Residents were supported in accessing alternative accommodations and have not returned to the Property. My team is working hard to provide similar supports to other Existing Residents. There are currently 29 Existing Residents (i.e., individuals present prior to April 16, 2025) on the Property.

45. The main difference from the work being done by USWs at the Encampment and the regular practice of USWs in the Region that support unhoused individuals is that there is now a “closing date” for 100 Vic, after which Existing Residents will have to leave the Property. This creates somewhat greater urgency to find alternate solutions than if the Property were not otherwise needed by the Region. However, considering my team’s success to date with Existing Residents, and its success at other encampment sites, I believe the objective is achievable.

46. IHPs need to be developed over time, as the plans themselves are tailored to the individuals’ needs and the availabilities of various shelter and accommodation. The required trust between USWs and individuals is also built over time. Sometimes, initial steps must be completed before an individual is willing to accept a shelter or other accommodation placement. For example, one’s belongings must sometimes be stored appropriately, or a pet may need to be placed temporarily with a trusted person, which can affect the timeline for implementing IHPs.

47. Because both developing IHPs and their successful implementation take time, when I was consulted about the By-law, my view was that the Region needed to be able to control access to the Property so that my team could focus on Existing Residents while also continuing its work across the Region.

48. If an inflow of new individuals arrives at the Encampment as December 1 approaches, it will be increasingly difficult, if not impossible, for my team to resettle these individuals appropriately under tight time constraints. Being moved from one’s home can

be a challenging experience at the best of times. When we consider the circumstances that have contributed to an individual living rough in an encampment, in my experience, those challenges are elevated. I want to avoid causing unnecessary trauma to individuals who join the Encampment and then are forced to move somewhere else shortly after, especially in circumstances where there has not been sufficient time for an IHP to be developed and implemented for that individual.

49. Given the above, my view is that preventing the Encampment from increasing in numbers beyond the Existing Residents is necessary to allow my staff to implement the Plan effectively. Site management by limiting population growth in the Encampment is therefore an important element of the By-law from my team's perspective.

50. This sort of site management is akin to how my team handles the planned permanent closure of a shelter or other housing facility. In such a case, the shelter does not simply operate at full capacity one day and then shutter the next. Instead, in advance of the closure date, the shelter stops accepting new intakes, and my team focuses its resources on prioritizing access to alternative shelter for the closing shelter's residents, who my team knows will very soon no longer be able to rely on their current shelter situation.

51. This wind-down method allows for a better transition for shelter residents and provides my team with the time they need to devise and implement effective IHPs. This is precisely the sort of method that the By-law contemplates by preventing new individuals

from coming to the Property and joining the Encampment while my team is working to resettle individuals who were already living there before the site closure was announced

G. An Alternative Encampment Site is Not a Feasible or Desirable Option, and is Not Part of the Plan

52. The Region considered whether it could provide an alternative site to which the Encampment could be relocated. This is unfeasible for many reasons. Moreover, such an approach is inconsistent with the PECH, and in my view will perpetuate rather than solve the challenges facing Existing Residents.

53. First, the Region does not own vacant land that is reasonably proximate to the Encampment which would also allow for appropriate access to services Existing Residents need. Purchasing an empty lot that is located near the Property would be a multi-million-dollar endeavour, if it is even possible. In my view (and in the Region's view), this money is better invested directly in the sort of programming and housing options I have described above. As I will explain in more detail below, the Region has been steadily increasing the resources it allocates to my team's work for the past few years, and this is crucial to enabling the success of my team in developing and implementing IHPs. Moreover, there has been no approval from Regional Council to acquire or allocate a piece of land for that purpose.

54. Second, as I will explain below, the Region has invested significant resources in the day-to-day management of the Encampment given the health and safety risks that a site like this poses to Encampment residents and the wider community. Again, in my view, these resources are better directed into my team's efforts to find suitable accommodation

for unhoused individuals. Even more, if an alternative site becomes available and the Region effectively sanctions it as a long-term solution to homelessness, I expect that the population living on that site will increase, which will lead to increased risks and financial costs. Without this management, the Encampment would be an even more unsafe place than it is today.

55. Third, Encampment-based living is inconsistent with the Region's own commitments to addressing chronic homelessness (including those found in the PECH). The Region is committed to an evidence-based housing-first approach, which is a central tenet of its policies and procedures for addressing homelessness. Facilitating long-term encampment living is in stark opposition to this policy goal.

H. The Region Cannot Ensure that the “number of homeless persons” will not “exceed the number of available accessible shelter beds in the Region” in 2025

56. Like most other Canadian municipalities, the Region has been grappling with the complex and multi-faceted issue of homelessness in the last several years, and particularly since the pandemic.

57. With the PECH, the Region has adopted a long-term strategy for addressing the challenges of homelessness and has devoted substantial resources to ameliorating the conditions of the unhoused residents in the municipality. In 2024, approximately \$56.8 million was allocated to programs to support the needs of people experiencing homelessness in the Region. This is a substantial increase from the \$30.9 million allocated in 2022 (the year before the Persons Unknown Decision).

58. The PECH follows through on the Region's approval of a staff recommendation in 2022 to develop a "Homelessness Master Plan", as set out in the Persons Unknown Decision at para. 35. The Region approved this recommendation at its August 18, 2022 meeting.

59. The Region has made substantial progress under the PECH in increasing its capacity to provide long-term solutions to meet the needs of unhoused residents. In 2024, 212 people with high service needs who were formerly experiencing chronic homelessness were housed through Prioritized Access to Housing Support ("**PATHS**"). The PATHS process coordinates services of the Region and its housing system partners to support those with the greatest depth of need and vulnerability. This is an increase from 103 people housed through PATHS in 2022.

60. Unfortunately, despite the Region's efforts, the challenges posed by homelessness have continued to increase.

61. Since 2018, the federal and provincial governments have mandated bi-annual "Point in Time Counts" ("**PIT Counts**") of the number of people experiencing homelessness. The Region conducted a PIT Count in 2021, which found that there were approximately 1,085 people experiencing homelessness at that time. The most recent PIT Count for the region was conducted in late 2024. At that time there were 2,371 individuals experiencing homelessness in the Region, and of those surveyed, 78% said they experienced chronic homelessness. Copies of the PIT Counts for 2021 and late 2024 are attached as **Exhibit D** and **Exhibit E**, respectively.

62. I understand that this increase between 2021 and 2024 is generally consistent with trends of increasing homelessness rates in Ontario. For example, I attach as **Exhibit F** a copy of a report by the Association of Municipalities of Ontario which found that an estimated 85,515 people in this province experienced homelessness in 2024, representing a 25% increase from 2022 (see page 8 of Exhibit F).

63. As outlined above, homelessness is a complex social problem with many interrelated causes. The Region does not – and cannot – control each of the factors that influence rates of homelessness.

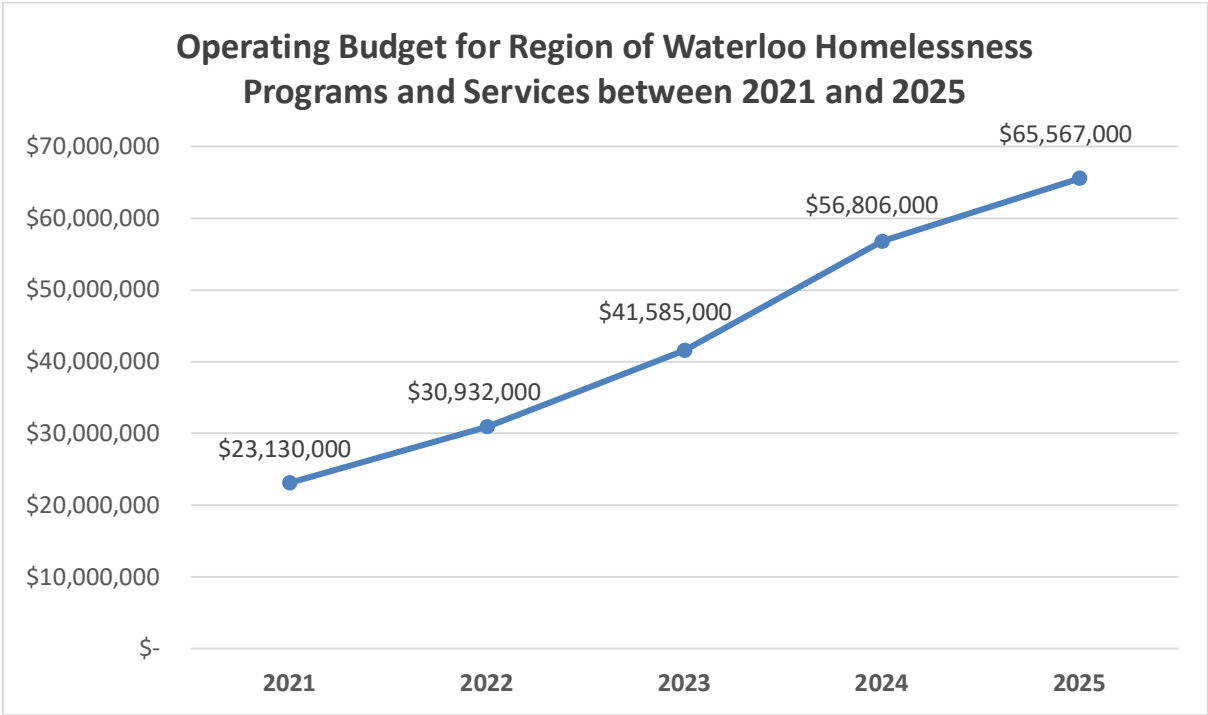
64. One major driver of homelessness is the increased cost of housing. As governments reacted to the pandemic with economic policies intended to stabilize the overall economy, housing prices in Canada increased substantially. Low interest rates tied to Bank of Canada policy provided an incentive for prospective home buyers to borrow large amounts to finance ever-increasing prices. This in turn drove many people who might otherwise have purchased a home to rent, driving up the costs of rental housing. Inflation, population pressures, and rising unemployment have also played their parts in increasing costs of housing and increasing the number of people experiencing homelessness. There is an acknowledged shortage of housing across the country. Unfortunately, many people have been left behind by these trends.

65. The Region can also only work within its jurisdictional boundaries, both in terms of the types of policies and programs it can implement, and the physical area in which its

activities can take place. By contrast, homelessness is a diffuse problem, with causes going far beyond the physical and legislative boundaries of the Region.

66. The Region addresses homelessness through various means, including through program planning, service delivery, resource distribution, compliance, quality assurance, and needs and demand analyses in the areas of housing and homelessness.

67. At a high level, the Region's operating budget for 2025 allocates \$65.5 million for programs and services that are aimed at addressing homelessness. This is a 15% increase from the \$56.8 million that the Region invested in its direct efforts to combat homelessness in 2024. However, despite these substantial increases over the last few years as shown in the chart below, the Region's adoption of the PECH, and the increased capacity that the PECH and additional funding have brought, the PIT Count has continued to rise.



68. One of the programs the Region operates to alleviate the harms of homelessness on individuals is the Emergency Shelter Program. The Region and various third-party providers operate nine total emergency shelter sites in the Region of Waterloo.

69. Providing access to shelters allows individuals with nowhere to stay access to somewhere to sleep overnight. Individuals who access emergency shelters also receive services designed to meet their basic needs and help them move forward with the next steps in their individualized housing plan, which assists them in finding and securing safe, permanent housing.

70. Sites in the Emergency Shelter Program are located throughout the region: there are four in Kitchener, three in Cambridge, and two in Waterloo. Some shelters operate 24/7 while other operate overnight only.

71. The sites that comprise the Emergency Shelter Program provide services and supports for different sub-group populations of individuals experiencing homelessness:

- (a) Two shelters focus on supporting youth of all gender identities: SafeHaven 2.0 for youth aged 12-17 and oneROOF supporting youth ages 16-25;
- (b) Two shelters exclusively serve single adult women and gender diverse individuals – one in Kitchener and one in Cambridge;
- (c) Three shelters support adult men only, while two support adults of all gender identities;
- (d) For those in couple relationships or with pets, there are accommodation options that can support these needs; and
- (e) Six sites can accommodate physical accessibility needs.

72. In addition to the basic needs and housing-focused services and supports mentioned above, shelter sites across the Emergency Shelter Program may provide additional support tailored to the populations that they serve. For example, ShelterCare provides integrated health services, including addictions services and a safe use room onsite. The Kinsmen shelter site provides limited medical care onsite for program participants.

73. Emergency shelter capacity in the Waterloo Region fluctuates throughout the year, typically peaking in the winter. This reflects the seasonality of demand for shelters –

namely, that there is typically a greater number of people seeking to access shelter services in the colder months, when sleeping rough is less tenable.

74. To help meet the increased demand, the Region and its partners added temporary winter shelter spaces to the Emergency Shelter Program and opened two winter warming centres this past winter (2024-2025). 32 beds were temporarily added at two shelter sites from October 2024 until March 2025, with 12 of these beds dedicated to youth ages 16-24. A total of 60 beds were available at two winter warming centres from January until April 2025. The winter warming centres operated as places for people experiencing unsheltered homelessness to come in from the cold and be connected to human and housing services.

75. I have created the following charts summarizing the emergency shelters, transitional housing sites and winter warming centres operated and/or funded by the Region and its partners, the per night capacity of each facility in both the winter and spring months and the most recent average emergency shelter occupancy:

Emergency Shelter, Transitional Housing and Winter Warming Centre Capacity 2025

Service Provider	Regular Capacity as of May 2025	Winter Capacity Oct 2024-Mar 2025
Cambridge Shelter Corporation - Bridges	80	80
YWCA Cambridge	20	20
ShelterCare	100	100
oneROOF	24	18
SHIP Edith MacIntosh*	30	30
SHIP 84 Frederick	47	47
SafeHaven 2.0	10	10
Kinsmen	16	16
Erb's Road	50	50
Cambridge Shelter Corporation - Super 8 Winter Overflow	0	20
oneROOF - Winter Overflow	0	12
Emergency Shelter Total	377	403
Thresholds Homes & Supports Winter Warming Centre**	0	30
Porchlight Winter Warming Centre**	0	30
Winter Warming Total	0	60
University Avenue	80	80
Marillac Place	10	10
Starling Life Launch	6	6
Porchlight (treatment program)	16	16
Transitional Housing Total	112	112
Total - All Programs	489	575

*agreement in place until March 2026

**warming centres were open until April 30 2025

Emergency Shelter Program Occupancy 5-day Average (May 11-15, 2025)

Service Provider	5-Day Average Occupancy (%)
Cambridge Shelter Corporation - Bridges	88%
YWCA Cambridge	99%
ShelterCare	94%
oneROOF	63%
SHIP Edith MacIntosh	over capacity
SHIP 84 Frederick	84%
SafeHaven 2.0	30%
Kinsmen	83%
Erb's Road	90%

76. As listed in the charts above, in April 2023, the Region also opened a tiny homes shelter located at 1001 Erbs Road, Waterloo (**“Erbs Road Shelter”**), a hybrid shelter (each of which is furnished, and equipped with electricity, heating and cooling). The site is owned by the Region and operationally managed and staffed by The Working Centre 24/7 (including through providing support services and security). Services provided at the Erbs Road Shelter include mental health and addictions supports, with a strong focus on connecting residents to more permanent housing options. Since its opening, 27 people have moved into permanent housing from the Erbs Road Shelter. Given the positive response to the Erbs Road Shelter, Regional Council has approved operations for this site until at least 2030.

77. As noted in the chart above, the Region also funds, monitors, and oversees a transitional housing program with 112 spaces across four sites. This program provides time-limited housing and stabilization services that support individuals to move forward with their individualized housing plans and find and secure safe, permanent housing. Services provided through this program are focused on the needs of the individual and the program includes dedicated sites supporting young mothers and youth ages 16-17.

78. The Region funds and operates a program that serves individuals who are unable to access the emergency shelter and transitional housing programs mentioned above for a variety of reasons. This program stabilizes individuals transitioning from encampments in motel accommodation, connecting them to essential human and housing services alongside individualized housing plan and housing search support.

79. Beyond shelter-centric programming, the Region also funds two housing loss prevention programs. Two housing resource centres are operated by Starling and connect people with housing-focused planning and search support with the goal of helping them find safe, sustainable housing. These centres in Kitchener and Cambridge served 3,875 households, from April 1, 2024, to March 31, 2025. In addition to the housing resource centres, the Social Development Centre provides peer housing outreach and eviction prevention services to support individuals at risk of losing their housing to stay housed.

80. The Region also funds a street outreach program, which aims to assist with addressing immediate issues related to health, safety, and housing for those experiencing homelessness. This program is operated by the Working Centre, Thrive HIV, Sanguen, and oneROOF.

81. The Region also funds, monitors, and oversees a supportive housing program. Supportive housing is affordable housing which provides wrap-around support services to participants. This program is delivered in fixed site and scattered site models. There are currently 407 scattered site units and 401 fixed site units, some of which are dedicated to specific sub-groups of individuals experiencing homelessness including youth (ages 16-24), women, gender diverse individuals, seniors, Veterans and families with dependent(s).

82. The Region also maintains a community housing waiting list to access affordable housing in the future. Community housing is affordable rental housing for people who

have a low to moderate household income. There are over 10,000 units of community housing throughout Waterloo Region.

83. By centering their work around personally designed IHPs, my team helps individuals experiencing homelessness access the services above in a manner that is best tailored to their specific needs. For example, for an individual with a history of addiction issues, an appropriate IHP may prioritize sober living spaces, or may prioritize access to a safe use site depending on individual needs. For a gender-diverse individual, a shelter that is not subdivided by gender may be a more suitable option than a gender-segregated living arrangement.

84. IHPs also recognize that not all individuals are ready to move into permanent housing. For many, accessing a shelter, motel room, or other transitional living arrangement is a necessary first step to obtaining the stability required to move into a more long-term housing arrangement such as subsidized housing or accessing a rental supplement program.

85. Despite all of these programs and initiatives (which collectively represent a substantial increase in funding and capacity for the unhoused since the Persons Unknown Decision), the Region is still some distance from being able to demonstrate that “the number of homeless persons [no longer] exceeds the number of available accessible shelter beds in the Region”, as it was invited to do by the Court in order to terminate the Court’s declaration respecting the Code of Use By-law.

86. However, the Property is now needed by a specific time and for a specific purpose relating to the construction of the KCTH. In these circumstances, the Region has passed the site-specific By-law No. 25-021, accompanied by the specific Plan for the Existing Residents. The Region seeks this Court's guidance on whether By-law No. 25-021 is constitutional.

I. The Services Provided by the Region at the Encampment

87. The Region has worked to build relationships with individuals residing at the Encampment and has taken steps to enhance the health and safety of those present at the Property. It is my belief that, without the supports provided by the Region for the Encampment that I detail below, the Encampment would be a more dangerous and disruptive place than it is today.

88. In or about March 2022, the Region assigned security guards through Barber Collins Security near the Property to monitor and respond to issues at the Encampment. The Region did this because the Encampment had become very large with numerous disruptions and complaints from the public, and the Region was concerned for the safety of Encampment residents and others living and working in the general vicinity of the Encampment. The Region continues to hire Barber Collins Security for this purpose, and its personnel are onsite at the Encampment every day for this purpose.

89. Since in or about June 2022, the Region has retained pest control to address a rat infestation present at the Encampment. Pest control attends at the Property every week to provide pest removal services.

90. Since March 2021, the Region has also arranged for a regular cleaning of the Property to ensure that garbage from the Encampment is managed including daily servicing of the portable toilets onsite. Starting in or about May 2022, the Region has arranged for large waste bins to be brought onsite every two weeks to support site cleaning. These bins are emptied regularly.

91. The Region also previously paid for janitorial services to clean the washrooms at the nearby St. John's Kitchen, and 24/7 access so that Encampment residents had access to clean washrooms. From April until August 2022, the Region provided security support to allow for safe and orderly access to these washrooms overnight. Since August 2022, the Region has installed portable toilets on the Property to ensure washroom access for Encampment residents. There are currently three portable toilets on the Property.

92. In 2023, Housing Services started a new team of USWs to increase housing outcomes and service connections for people residing in encampments. These Region-employed staff are onsite at the Encampment daily building relationships with the individuals residing there, and they help to develop IHPs and facilitate transitions to alternate accommodations such as shelters or other housing. There are currently six staff that comprise this team. Over the last year (April 1, 2024 – April 30, 2025), 43 individuals from the Encampment have been successfully referred to housing.

93. The Region's costs associated with the Encampment are approximately \$66,200 per month as of April 2025, inclusive of on-site security provided by Barber-Collins

Security, pest control, garbage removal, portable toilets, and ongoing servicing and maintenance. This figure does not include staffing costs for social supports, outreach, facilities, or by-law staff who attend the site regularly.

J. The Risks to Encampment Residents Arising from the Encampment Environment

94. The Region has become increasingly concerned about potential risks to residents of the Encampment and the broader public. Some of the Region's concerns with respect to the Encampment include:

- (a) Overcrowding and congestion on the site;
- (b) Evidence of drug paraphernalia that has not been properly disposed of, including syringes and needles;
- (c) Barbecues, propane tanks, and the presence of significant debris on the site, which create significant fire risks;
- (d) Security incidents on the site, including violent altercations between residents of the Encampment;
- (e) Significant clutter and garbage on the Property;
- (f) Evidence of rodent activity on the site, including rodent feces;
- (g) The presence of human urine and feces; and

- (h) Construction of semi-permanent structures out of sandbags, with no building permits and no apparent adherence to any building standards.

95. I have attended the Property many times as part of my responsibilities as Commissioner of Community Services for the Region. During my time there, I have witnessed every type of the concerns I articulate above.

96. Sadly, I am aware of at least five documented deaths at the Encampment since I joined the Region in June 2022. I attach a summary of related incident reports from the security portal for each of the deaths as **Exhibit G**. I have made redactions to these reports to remove information that could be used to identify the deceased individuals referenced therein, as well as to respect the privacy and confidentiality of Region staff responding to these incidents.

97. I am not in a position to say what caused these deaths, which is a matter for the coroner. I can say, however, that the Encampment environment appears to me to be far from ideal for those who are suffering major health challenges and the likelihood that these numbers are under-reported is high.

98. Based on my experiences at the Region and in prior roles, I believe this number does not include incidents where individuals were found non-responsive at the Encampment and later passed away at a hospital. This number also does not include situations where a death resulted from toxic drugs obtained at the Encampment, but where the individual died at a location other than the Encampment. The number of deaths recorded at the Encampment also does not reflect the overall negative health impacts of

encampment living, including a decrease in overall life expectancy for some individuals. I believe the true number of encampment-related deaths is likely higher than the reported figure.

99. There have also been several fires at the Encampment since it was established. Attached as **Exhibit H** is a series of major incident notification reports documenting these fires. Fires on the Property pose a threat to the safety of both those living at the Property and the neighbouring community. I have redacted these reports to protect the personal information and privacy of Region staff and the victims involved.

100. As noted above, there have also been several violent altercations between residents. I attach the incident reports relating to these altercations as **Exhibit I**. I have redacted these reports to protect the personal information and privacy of Region staff and the victims involved.

101. I am informed by the Region of Waterloo's Security Department ("**Region Security**") that while all incidents, such as fires and violent altercations, are reported through security dispatch, incident reports are not created or available for each incident. Region Security has advised me that from April 1, 2024 to the date of this affidavit, there have been a dispatch record of 37 minor fires reported for the Encampment in addition to the four major fires for which incident reports were created (see Exhibit H). I understand that a "major fire" is one that entails significant damage to or loss of structure or tent and/or involves a response from the Kitchener Fire Department Region. A "minor fire" falls short of that definition, but it can still involve damage to property or harm to an individual.

Crucially, the difference between a major and minor fire is often luck and early intervention.

102. Security also informed me that there were 19 major altercations reported at the Encampment since December 1, 2023, far more than the incident reports in Exhibit I suggest.

103. I also attach a photograph of a sandbag structure that has recently been built on the Property as **Exhibit J**. I am concerned about the structural soundness of this makeshift building.

104. It is my belief, based on the above, that many of the Existing Residents will be safer and have access to better supports once they transition to alternative accommodation arrangements under the Plan, as described above.

105. The above circumstances have also contributed to my view, which I hold strongly, that creating a new, Region-sanctioned encampment on a different piece of property is a poor choice for the Region, for Existing Residents and for those in the Region experiencing homelessness. In my view, we should be prioritizing the development and implementation of IHPs for Existing Residents and those experiencing homelessness across the Region with the resources available to us.

K. *The Region's Need to Manage the Site and Need for the Powers Set Out in By-law 25-021*

106. By-law 25-021 is intended to provide Existing Residents with the right to continue to reside at the Encampment until November 30, 2025, or such time as they agree to

transition to alternative accommodation arrangements, whichever comes first. This is subject only to the proviso that they do not engage in any conduct that constitutes a serious threat to their own health and safety or to the health and safety of other persons.

107. The By-law restricts anyone who was not already residing at the Encampment as of April 16, 2025 (the date when public notice of the By-law was provided) from moving into the Encampment. The Region is focusing on meeting the needs of the Existing Residents and transitioning them to appropriate alternative accommodation. If there was an influx of new residents seeking to establish themselves, the Region would be less able to meet these needs, less able to provide services, and less able to monitor and ameliorate the safety risks to the Existing Residents.

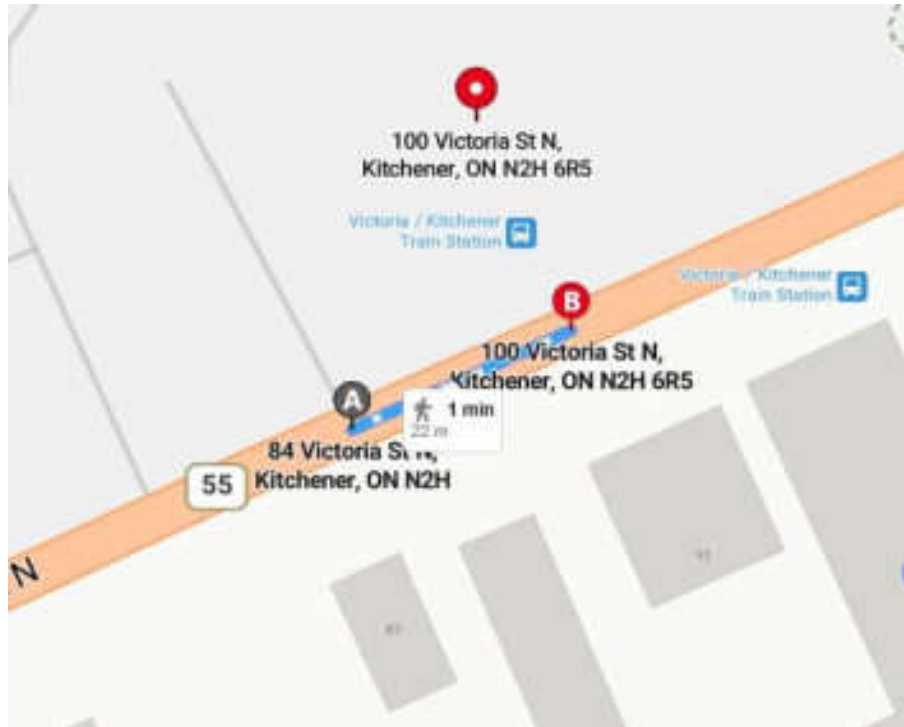
108. The By-law also confirms the Region's ability to manage the site, address disruptive behaviour of residents and visitors to the site and to ensure that the Region can continue to deliver services, including meetings between members of my team and Existing Residents to work on and develop IHPs.

109. Unfortunately, there have been incidents in past when some individuals who consider themselves advocates for the rights of the Existing Residents have shouted down the Region's USW team, or interposed themselves between USW team and the Residents, and impeded or prevented the Region from providing services, including USWs seeking to inform residents of the options that are available to them under the Plan. I attach incident reports arising from these incidents as **Exhibit K**. I have redacted

these reports to protect the personal information and privacy of Region staff and the victims involved.

110. The By-law also protects the Existing Residents, visitors, and Region staff from conduct that is intimidating, threatening, or sexual harassment. This is for the protection of all persons at the Property and to limit the opportunity for non-residents to interfere with the delivery of services to the site and to the people there. There are no restrictions or prohibitions on bringing food or supplies to the Existing Residents, if those who do so adhere to the rules set out in the By-law.

111. While parking is not available directly at the Property for safety and space reasons, there is parking available at 84 Victoria Street North, an adjacent site. Those bringing donations or offering other assistance (including legal counsel) have been directed to use that site to park vehicles as needed. Below is a screen capture image indicating where the Property is in relation to 84 Victoria Street North:



112. I understand that the Region has adopted a measured approach to enforcement of the By-law. No charges have been laid to date, and no trespass notices have been issued. For the first few weeks, Region staff have been attempting to explain the By-law and the options under the Plan to the Existing Residents. To date, the focus has been on education rather than enforcement activities.

113. Provided that Existing Residents and visitors to the Property follow the direction of Region Staff and security in their efforts to manage the site and implement the Plan, we are hopeful that enforcement activities can remain low-key as the Existing Residents are transitioned to appropriate alternative accommodation arrangements. However, the By-law provides for the enforcement powers that Regional Council has assessed as being

necessary and appropriate and consistent with those set out in other by-laws enacted by the Region.

114. In keeping with the foregoing, to date, the Region has not taken steps to enforce the By-law. This is particularly so with respect to the Region's powers under the By-law to limit access to the site to Existing Residents.

115. As a result of the Region not enforcing the By-law, approximately fifteen new individuals have joined the Encampment since April 16, 2025, meaning that the Encampment now has a population of approximately forty-five individuals.

116. This demonstrates that, if the By-law cannot be enforced, the population present at the Encampment may increase beyond the Existing Residents, making it increasingly challenging to provide vacant possession of the Property by December 1, 2025.

117. As I explained above, as more individuals join the Encampment closer to December 1, it will be increasingly difficult for my team to assist these individuals properly through creating and implementing tailored IHPs. Just as keeping a closing shelter at full capacity until the date of its closure is undesirable and inconsistent with the Region's usual practice, allowing the Encampment to grow will also pose significant challenges to the USWs working at the Encampment, and will be harmful for the community at the Encampment.

118. For this reason, enforcement of the By-law prior to December 1 is crucial for ensuring that my team can adequately support Existing Residents.

119. I believe that, with appropriate respect for the By-law, and the continuing efforts of my team, the Region will be successful in developing and implementing IHPs for Existing Residents that will facilitate their transition into more permanent forms of housing and an improved quality of life such that the Property can be made available for site remediation by December 1, 2025.

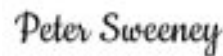
120. During this time, of course, my team will continue its work across the Region with all those experiencing homelessness.

AFFIRMED by Peter Sweeney of the City of Cambridge, in the Regional Municipality of Waterloo, before me at the City of Toronto, in the Province of Ontario, on June 6, 2025, in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits
(or as may be)

GRETA HOAKEN
(LSO # 879031)



Peter Sweeney

This is Exhibit "A" referred to in the Affidavit of Peter Sweeney affirmed by Peter Sweeney of the City of Cambridge, in the Regional Municipality of Waterloo, before me at the City of Toronto, in the Province of Ontario, on June 6, 2025 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits (or as may be)

GRETA HOAKEN

THE PLAN TO END CHRONIC HOMELESSNESS

Navigating Complexity Together

A Roadmap to Functional Zero by 2030

Waterloo Region
April 2024

The Plan
to End Chronic
Homelessness

IN COMMUNITY,
BY COMMUNITY,
FOR COMMUNITY.
#ThePlanWR

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Reading the PECH

This plan is a compilation of content developed by co-contributors including members of the Lived Expertise Prototyping Working Group, members of the Co-Creator Group, and members of the project team. It is rooted in extensive Community Engagement completed during the summer and fall of 2023 and the ongoing work of the Co-Creator Group and Lived Experts Prototyping Cohort.

Key Report Contributors

Plan to End Chronic Homelessness Co-Creator Group

Made up of system leaders, service staff and representatives from equity-owed groups. This group grew throughout our process as more members of the community found out about our work and as we developed relationships with key interest-holders through our work

Lived Experts Prototyping Cohort

Lived Expertise Prototyping is an ongoing process to integrate the experience and wisdom of lived experts into Waterloo Regional operations. This process has been facilitated by the Social Development Centre through 2023 and will continue to the end of 2024.

Black left margin bar identifies plan content that include Lived Expertise Prototyping Cohort voice.

Report Authors

- 

Region of Waterloo
The Region of Waterloo serves with caring and responsible public service, engages by listening and responding to community needs, and inspires by conducting business with openness to enhance public trust and confidence.
- 

Social Develop Centre Waterloo Region
The Social Development Centre Waterloo Region is a learning organization that supports all voices in creation of community wide solutions ensuring that lived experience is the basis for collective action.
- 

Overlap Associates
Overlap Associates is a local design consultancy that puts people at the centre of our work and your solutions. Overlap works with organizations of all sizes on problems that matter most to them.

Co-Creator Membership and Community Support for the PECH

"If we could go back and do it differently,
emphasize the interlinkages between
organizations and systems" —Engagement Participant

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Canadian Alliance to End Homelessness	Probation and Parole
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Introduction

Introduction

The Region of Waterloo's Vision Statement outlines an aspirational future state—*A compassionate community that cares for all people, stewards the land for future generations and where everyone has the opportunity to live a good life.* The work of bringing about this future state is deeply rooted in our efforts to end chronic homelessness in Waterloo Region.

The intention of the Plan to End Chronic Homelessness (The PECH) is to detail our collective journey to this end goal. **And yet, there is urgency and complexity that cannot be fully expressed in this document**—the depth of human suffering in our community; the need for frank public discourse about the harms of criminalization of the unsheltered (LE Prototyping Cohort, 2024); the impacts of the mental health and addiction crisis gripping a growing number of our families, friends and neighbours; and the tangible ways our collective values and apathy perpetuate the cycle of dehumanization (LE Prototyping Cohort, 2024) of those who need our care. The urgency and complexity of responding to this challenge means that defining what is in scope or out of scope of the PECH is a difficult task.

Here lies a key tension emerging from our work of creating the PECH—the stated ask and desired outcome from Regional Council, an action plan outlining tangible steps to achieve functional zero chronic homelessness, does not align fully with the stated needs from the community. Community and Lived Experts have highlighted that ending chronic homelessness will require:

- A focus on process rather than product/outcome (the “how” is equally as important as the “what”)
- Recognizing and naming failures and harms caused by contributing systems in our society (including colonialism, the financialization of housing, criminalization of homelessness) (LE Prototyping Cohort, 2024)
- It is critical to address the current gaps in service provision and intervene at different levels of systems—branches, trunk and roots—for transformative change within the structures and power systems that maintain the problems (LE Prototyping Cohort, 2024)

Stated clearly, reaching functional zero chronic homelessness will require significant system transformation beyond simply increasing the same supports that we currently have in place and will require examining systems, incentives, values and mindsets that may seem tangential to the problem of homelessness. The magnitude of the complexities and challenges is beyond the mandate of The Region of Waterloo to solve. The macro forces that have led to the current homelessness crisis must be addressed through collective action. Action that is supported by the

broader local community, Area Municipalities and through increased investments from Provincial and Federal governments.

The resulting Plan to End Chronic Homelessness is a living document infused with the voices of our community and Lived Experts and lays out our proposed approach to achieving functional zero homelessness in Waterloo Region by 2030.

Through our broad community engagement and co-design process it became clear that if we hope to end chronic homelessness we must transform the Housing Stability System to be:

- **Responsive**—allow community voices—including Lived Expertise and Equity-Owed Groups—to drive our decisions (LE Prototyping Cohort, 2024)
- **Sustainable**—creating system supports to staffing that addresses capacity, recruitment/retention, training, mental health supports and wellness
- **Integrated**—more efficient and aligned within the sector and with other sectors including but not limited to health, justice, social & disability services, children & youth services and other related service systems
- **Inclusive**—it must be person-centred, ensuring that individuals no matter their circumstance (LE Prototyping Cohort, 2024) can access services
- **Adaptive**—expand our current continuum of supports and resources to match the current and future needs of our community. We must take proactive, predictive and preventative action to address the changing demographic of homelessness

Our vision for system transformation is a Housing Stability System that is an integrated, inclusive, adaptive, responsive and sustainable ecosystem. The Plan to End Chronic Homelessness articulates how **working in community, by community, for community** will strengthen relationships and build a shared ownership of solutions.

Methodology and Discussion of Process

Our core intention to co-create The Plan is part of what makes this journey different.

Our aim remains to create a plan that is driven by community identified needs, gaps, and solutions. We will continue to do this by working “in community, by community, for community”.

We are committed to these ways of working:

- Shared solutions and implementation
- Centering the voices of those most impacted
- Transformational relationships and trust building
- Inclusive community engagement

At the outset of this work there were two parallel processes—The SDCWR Lived Expertise Prototyping Cohort and the Overlap-led work to produce The Plan. The

intention of these two processes was the centering of lived expertise and creating time and space for their interpretation and wisdom to influence our process, outcomes and to begin the process of developing meaningful relationships.

This council report is supported by two separate reports/planning documents as for consideration by Regional Council. These reports are separate, but linked, and are intended to highlight the differences in the approach and perspectives between Lived Experts and the more system/politically influenced plan.

Lived Experts have provided input on several key features of our plan including definitions, the analogy and imagery of the Tree as a representation of our problem and solution spaces, Strategic Focus Areas and Actions.

The Plan took shape over the course of monthly Co-Creator Roundtables starting in June of 2023. Co-Creators worked to synthesize engagement data, shape the Strategic Focus Areas and generate Actions. The Actions in this document were summarized from upwards of one hundred projects and initiatives identified by Lived Experts and Co-Creators. These projects and initiatives were summarized for the benefit of the reader as they were highly technical and numerous. The 30 Actions currently living in the document give a tangible overview of the work that will take place to bring about our system vision and reaching our end goal of functional zero homelessness by 2030. The intention is to further explore, prioritize and implement actions based on this original list of projects.

Framing the Lived Experts Prototyping Process and Attached Report

The Social Development Centre Waterloo Region (SDC) is a core partner on the Plan to End Chronic Homelessness. From this partnership, the Prototyping Process was developed to centre the voices of Lived Experts and innovate solutions with Regional Staff and other interest-holders.

The Prototyping Process began in March 2023 with an initial cohort of representatives from the Lived Expertise Working Group, the People's Action Group, Regional Staff, SDC staff, and outreach workers. This cohort developed a model of communication and collaboration to make prototyping possible. They also conducted Participatory Action Research with current residents in unsheltered communities. From these conversations, they developed language and models about the problem space such as the Tree metaphor at the centre of the PECH. At the end of this initial phase, five areas of further prototyping were identified.

The Cohort has since expanded to over 30 representatives, including Lived Experts, mutual aid group representatives, advocacy group representatives, agency representatives, and an expanded group of Regional and City staff. The Prototyping

Process currently is slated to continue to the end of 2024 with recommendations on how to embed the principles of lived expertise, collaboration and learning in the ongoing work of the Region.

Members of the cohort met intensively for two months to develop the report calls to action included in the appendix. This report includes key terms, legal context for a human rights approach, and 30 calls to action for consideration. The report has deeply informed the development of the Plan to End Chronic Homelessness.

The partnership with Lived Experts and the Social Development Centre Prototyping Process has added tremendous value and insight into the PECH and the process of creating it.

We have worked throughout the process to create meaningful moments of cross-pollination between the two streams of work. We recognize that these efforts have been successful and yet there is a large amount of work to do to continue building relationships and trust between lived experts, grassroots organizations, advocates and ROW staff and leadership.

Our collaboration has also illuminated the existing contrasting opinions about the approach to ending chronic homelessness in the Region. The attached report—created by Lived Experts—is an example of the differing perspectives and a view of the contrast between the groups. (LE Prototyping Cohort, 2024)

Definitions

Definitions

We have included a definitions section as clear and consistent language is an important part of the process of finding common understanding as a community. And we acknowledge that language is ever evolving, different groups use different definitions and part of the work is to continually evolve these alongside communities.

- **Accessibility**—Specific features incorporated by design with the goal to reduce or remove barriers to participation or enjoyment by all people. (LE Prototyping Cohort, 2024)
- **Adequate Housing**—Housing that meets the legal standards for security of tenure, affordability, habitability, accessibility, availability of services, location and cultural appropriateness. In the absence of such, the right to housing is not met. (LE Prototyping Cohort, 2024)
- **Chronic Homelessness**—Refers to individuals who are currently experiencing visible and hidden homelessness AND who meet at least 1 of the following criteria:
 - they have a total of at least 6 months (180 days) of homelessness over the past year
 - they have recurrent experiences of homelessness over the past 3 years, with a cumulative duration of at least 18 months (546 days)

(Reaching Home: Canada's Homelessness Strategy Directives, 2023)

- **Deeply Therapeutic Housing**—is housing designed to provide support for people with the highest levels of acuity. This includes but is not limited to individuals with significant complex substance use, concurrent mental health needs or who are otherwise medically fragile and are homeless, at risk of becoming homeless, or who are considered inadequately housed. This type of supportive housing is a gap in our system identified through community engagement and by lived experts and co-creators. The gap is emerging as our current system is not adequately addressing the needs of people who are deeply unwell. ([Supportive Addiction & Mental Health Housing \(SAMH\), n.d.](#))
- **Equity-owed groups**—These are groups that experience systemic oppression, marginalization, and discrimination often due to the legacies of colonization, slavery, and imperialism. These groups include but are not limited to those who are Black (African and Caribbean diaspora), Two-spirit and Indigenous Peoples

(First Nations, Inuit and Métis), and communities ` ` racialized as non-white; persons identifying with a disability/disability communities; members of 2SLGBTQIA+ communities; women, trans, and femme-presenting people; and those living in rural areas. (LE Prototyping Cohort, 2024)

- **Functional Zero (0)** —A community has reached functional zero (0) of any type of homelessness when the number of people experiencing homelessness is zero, or if not zero, then either 3 or .1% of the total number of individuals experiencing homelessness on a by-name list, whichever is greater, and sustained for 3 consecutive months. (*Built for Zero Canada Functional Zero Homelessness Question and Answer Document*, 2021)



Figure 1. Built for Zero Definition of Functional Zero Chronic Homelessness

- **Homeless Individuals and Families Information System (HIFIS 4)**— Developed by the Government of Canada, HIFIS is a Homelessness Management Information System (HMIS) that is designed to support the day-to-day operational activities of Canadian homelessness service providers. As a comprehensive data collection and case management system, HIFIS enables participating service providers within the same community to access, collect, and share local real-time homelessness data to ensure individuals and families accessing services are prioritized and referred to appropriate services at the correct time.
- **Homelessness**—Homelessness describes the situation of an individual, family or community without stable, safe, permanent, appropriate housing, or the

immediate prospect, means and ability to acquire it. It is the result of systemic or societal barriers, a lack of affordable and appropriate housing, the individual/household's financial, mental, cognitive, behavioural or physical challenges, and/or racism and discrimination. Most people do not choose to be homeless, and the experience is generally negative, unpleasant, unhealthy, unsafe, stressful and distressing. (LE Prototyping Cohort, 2024)

- **Human Rights Approach**—People experiencing homelessness are treated as rights holders, where their agency is respected, and where the Region has a duty of care for their housing needs. Region will be compliant with national and international human rights law and ensure it is appropriately prioritized amidst other legal obligations such as those regarding property rights, privacy and liability. (LE Prototyping Cohort, 2024)
- **Housing First (HF)** Is based in a human rights framework and has two primary components: **housing and support**. It is not housing only.
 - **Housing:** participants are provided access to housing of choice in the community—facilitated by portable rent supplements—that is no more than 30% of their income.
 - **Support:** access to wrap around addiction/mental health supports, intensive case management and other supports aimed at promoting housing stability, recovery, community integration, and achievement of life goals.
 - Housing First is driven by 3 key principles:
 - consumer choice and self-determination
 - recovery (treatment focused)
 - community integration (physically, psychologically and socially).
 - Housing First is an empowerment approach in which the consumer is viewed as the expert on his/her experiences and aspirations; it is critical to begin by asking consumers where they want to live.
 - Recovery is a treatment orientation that refers to a participant's journey of growth and self-improvement in the direction of achieving life satisfaction.
 - The third principle is community integration. Whereas people with mental illness, who are homeless, often experience segregation, exclusion, and stigma. The goal is to help people become physically, psychologically, and socially integrated in the community.

(Dr. Geoffrey Nelson, Department of Psychology, Wilfrid Laurier University, n.d.)

- **Housing Stability System (HSS)**—The Region of Waterloo is the provincially-designated Service Manager for Housing and Homelessness. In this role, the Region is responsible for program planning, service delivery, distribution of resources, and quality assurance of housing-first services that help people find and maintain permanent housing; this network of services is known as the HSS. The HSS supports individuals and families across Waterloo Region who are experiencing homelessness, at immediate risk of homelessness, and in the recovery stages from homelessness.
- **Indigenous Homelessness**—“Unlike the common colonialist definition of homelessness, Indigenous homelessness is not defined as lacking a structure of habitation; rather, it is more fully described and understood through a composite lens of Indigenous worldviews. These include: individuals, families and communities isolated from their relationships to land, water, place, family, kin, each other, animals, cultures, languages and identities. Importantly, Indigenous people experiencing these kinds of homelessness cannot culturally, spiritually, emotionally or physically reconnect with their Indigeneity or lost relationships” (Thistle, 2017; see also (Aboriginal Standing Committee on Housing and Homelessness, 2012). (LE Prototyping Cohort, 2024)
- **Prioritized Access to Housing Supports (PATHS)**— A Coordinated Access System (Coordinated Access) is a systems-level approach for addressing homelessness that provides a consistent way to assess, prioritize and connect people experiencing homelessness to Region-funded housing and supports. Locally, this is referred to as the Prioritized Access to Housing Supports (PATHS) Process.
 - PATHS Process Overview
 - The PATHS process includes four main steps:
 - People experiencing homelessness are assessed for eligibility at defined access points across the system, using a common assessment tool.
 - If people are eligible, they join the PATHS List. The next step is to get offer-ready with support from PATHS Partners (Service Providers that help people to move forward with their Housing Plan while they wait) and Service Navigators (on the PATHS Team).
 - Once offer-ready, people are matched with a housing support vacancy and prioritized for an offer.

- In the final step, Housing Liaisons (on the PATHS Team) support people to transition to their new home.

**“Everybody needs and
deserves a safe place,
it's a human right.”**

—ENGAGEMENT PARTICIPANT

Framing the Problem

Framing the Problem

The number of people experiencing homelessness in Waterloo Region is unprecedented. Since the beginning of the COVID-19 pandemic, homelessness has risen in numbers and visibility. In the 2021 PiT (Point in Time) count, the Region found that more than 1,000 individuals were experiencing homelessness with over 500 of those individuals estimated to be experiencing chronic homelessness or homelessness for longer than six months.

Chronic homelessness in Waterloo Region has been increasing at an average growth rate of 28% year over year since 2020. Since January 2020, chronic homelessness in the region has increased by 129%. The unprecedented growth in homelessness is compounding existing difficulties both for individuals experiencing chronic homelessness and for the services within the system.

In September of 2023, in collaboration with our Co-Creator Group and the Social Development Centre (SDC) Prototype cohort, the PECH Core Team produced a [Key Findings Report](#). This report is an in depth exploration of the problem space rooted in community engagement findings, secondary research and analysis of current system data. Please refer to the report for further context.

The High-Level Problems we seek to address

- **The current system is not designed (LE Prototyping Cohort, 2024) or adequately resourced to address the increase in numbers of individuals (volume) requiring support or the increased complexity of needs that individuals have**
- **Current system leadership and governance approaches are undermining our community's ability to respond to the issue of homelessness.** The current structure of siloed and hierarchical decision-making is creating a lack of transparency and trust within the Housing Stability System and the broader community
- **Lack of Lived Expertise and Equity focus is creating system responses that do not align with the needs of the community and is actively causing harm**—systems need to sense and see themselves (LE Prototyping Cohort, 2024) in order for change to occur.
- The Province and the Federal government's retrenchment of building community housing in the 70's and 80's has led to reliance on the private market which has driven a **hyper-financialized capitalist model of housing. Increased housing**

costs are reducing access to housing for broad groups of our population.
(LE Prototyping Cohort, 2024)

- The prevalence of **mental health and substance addiction alongside the unprecedented crisis of drug poisonings** playing out in our community are intricately tied to the rise in and deepening complexity of experiences of homelessness
- There has been a long-standing issue of unequal access to services and support for individuals who are at risk of or experiencing homelessness in rural and township areas. To access the necessary support, individuals are often required to leave their rural communities and travel to urban centers, which can result in a loss of important community connections and **an increase in demand for urban-based services**. It is important to leverage the supports and services that exist in the rural areas to develop (co-create) a made-in-rural solution.
- The **face of homelessness is changing** (diversity , intersectionality)—This mix of factors is broadening the percentage of our community that is precariously housed, hidden homelessness, and housed in non-market options. This is giving us a skewed perspective of the causes of homelessness and those experiencing it in our communities. (LE Prototyping Cohort, 2024)
- **There is an increase in people living in encampments.** This trend highlights the growing rate of homelessness and—among many other factors—points to a shortfall in shelter capacity and accessibility, as well as barriers to securing permanent housing. (*Homeless Individuals and Families Information System (HIFIS)*, 2023) (Turner, 2023)

Key Numbers to Quantify the Problem

Chronic homelessness in Waterloo Region has been increasing at an average growth rate of 28% year over year since 2020. Since January 2020, chronic homelessness in the region has increased by 129%.

- If the 28% annual increase in chronic homelessness continues, the community will have triple the number of residents experiencing chronic homelessness by 2028.
 - As of February 2024, there are 558 individuals on the Prioritized Access to Housing Supports (PATHS) List.
 - The average number of days individuals on the PATHS list have been without permanent and safe housing is 1,403 days (3 years 8 months).

- 12% of all chronically homeless individuals on the PATHS list identify as Indigenous. This is an overrepresentation of Indigenous people experiencing chronic homelessness as they make up 1.7% of the total population of Waterloo Region.
- The supportive housing program across fixed-site and scattered options has a current capacity to support approximately 570 individuals.
- In 2024, approximately \$56 million will be invested into the local homelessness system in various service areas (outreach, prevention, shelter, supportive housing, etc.). Based on current state and future trends, this investment is not keeping pace with the growing need for additional supports to end chronic homelessness.
- Up to 70% of the folks experiencing homelessness or who are precariously housed have screened positive with the HELPs Screener as having an acquired brain injury (ABI) with similar trends in other regions. Often brain injury in the homeless population goes undiagnosed. It is not unusual for addictions and mental health issues to also be factors that impact their ability to maintain housing and also mask brain injury symptoms. Not only do these people require a specialized brain injury worker but additionally, wrap around supports offering all three areas of specialty through an integrated team approach.
- Youth homelessness is on the rise.
 - A recent survey from Children and Youth Planning Table showed 13% of youth respondents were experiencing homelessness (13% of 1867 respondents = 243 youth) in 2023 (*2023 CYPT DATA BRIEF*, 2024)
 - Youth shelters are frequently at capacity and are supporting individuals 12-18 years old. There has been a 20% increase from the previous two years.

Quotes and Stories Behind the Statistics

These statistics fold out into real living stories from valued neighbours in our community. These experiences represent a history of our systems level failures and the frustration and harm unchallenged systems bring. They also act as motivation and a call for change.

“Some guy beat me up on the street. Yeah, I was in the hospital because of it... I died a few times...Meantime my landlord, he got rid of everything in my apartment and I lost my rent geared to income housing and I ended up

discharged from the hospital and driven to the shelter.” — Project Willow
Interview Participant

“I slept in the parking garage across the street because I wanted to make the statement that I do have nowhere to go. And I’m not going back to a building that I’ve been raped in.” — Project Willow Interview Participant

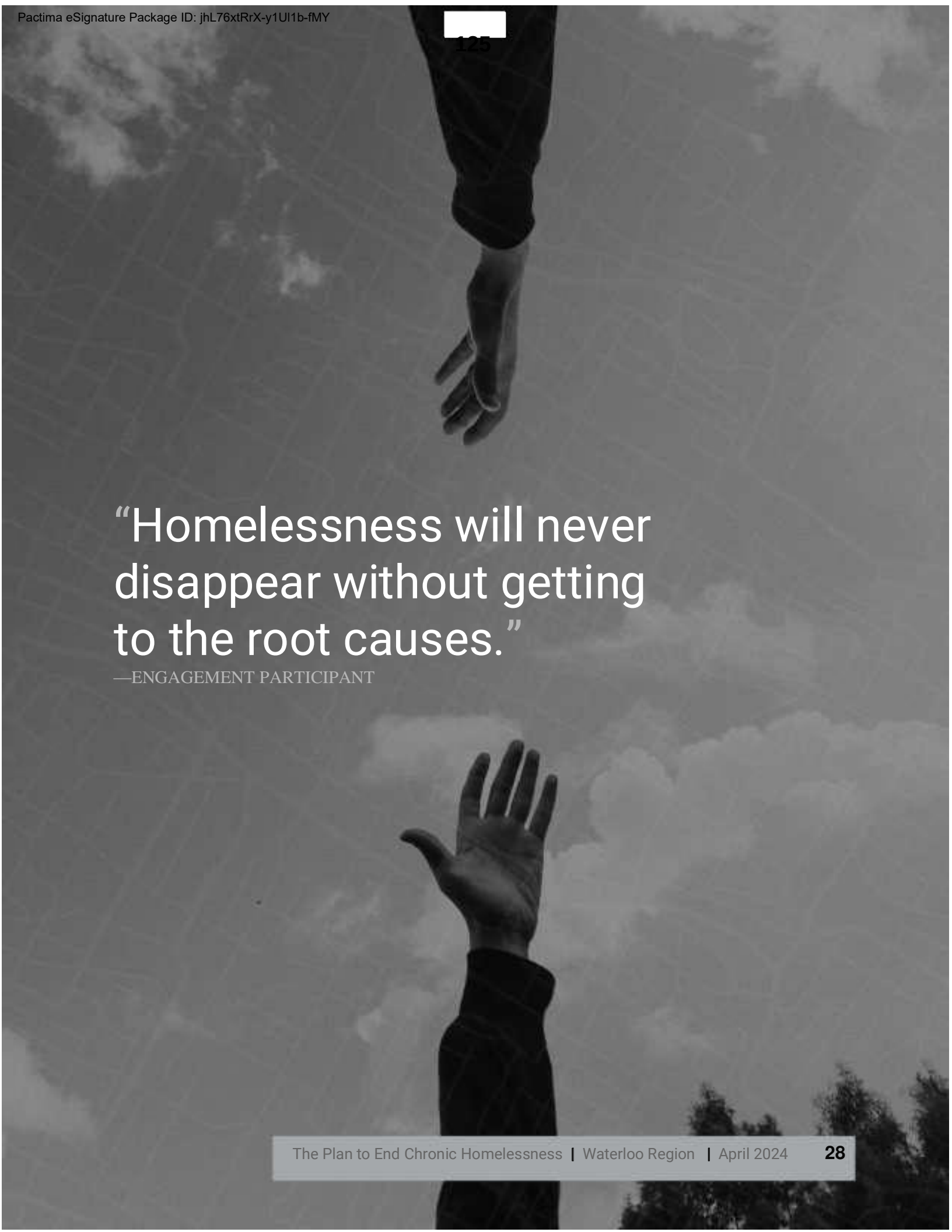
“You do not know how much actual physical, emotional and financial trauma that each one of us have gone through before we’ve even been able to have the strength and the courage to walk through these doors. Okay, because unless you’ve been through it yourself, then you don’t know it.” — Project Willow Interview Participant

“Why do we need to wait for someone to be on fire before we give them a hose?” — PECH Engagement Participant

“The ability to address the mental health and trauma pieces in which lead women to addictions and homelessness in the first place is something I have always believed to be at the forefront of being a piece of the shelter system. Housing, the safety in which one feels when they don’t have to be wet and unsafe on the street is only the tiniest fraction of being able to offer support to women in this community. A piece of the solution, is addressing the fragility of the client in which accesses services.” — Project Willow Survey participant

“There are no real safe places in the community” — Project Willow Survey Participant

Key Plan Elements



“Homelessness will never disappear without getting to the root causes.”

—ENGAGEMENT PARTICIPANT

Key Plan Elements

End Goal—To reach functional zero chronic homelessness in Waterloo Region by 2030.

Vision for System Transformation—To transform the Housing Stability System to be an responsive, sustainable, integrated, inclusive and adaptive ecosystem.

System Interventions—These are major changes we are proposing to the Housing Stability System to bring about our vision

Strategic Focus Areas—Large categories of work / activity to bring about our system interventions. These describe the broad areas of work within the PECH.

Actions—Clear projects, initiatives or achievements we will work toward that align with one or more Strategic Focus Areas.

Measurable Outcomes and KPIs—Outcomes of our Focus Areas that will show us we are make progress towards implementing our system interventions

Investment Strategy—strategic investments to stabilize the current system and transform the system.

Change Management Approach—These are principles, tactics and methods we will use to bring about our desired vision for system transformation.

System Overview for Ending Chronic Homelessness

This diagram represents how the PECH will transform the Housing Stability System to End Chronic Homelessness.

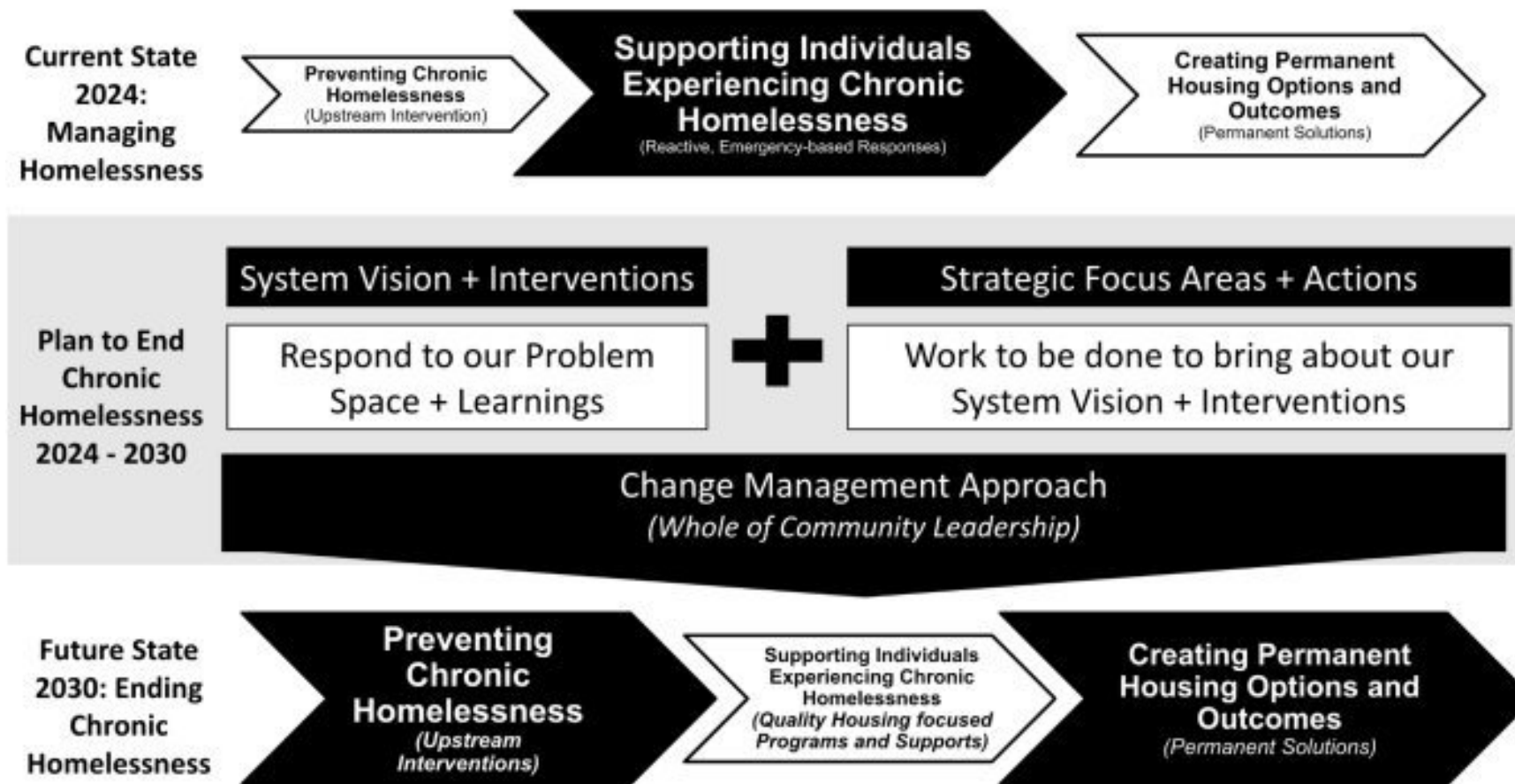


Figure 2. System Overview for Ending Chronic Homelessness

Inside The Plan—PECH High-Level Structure

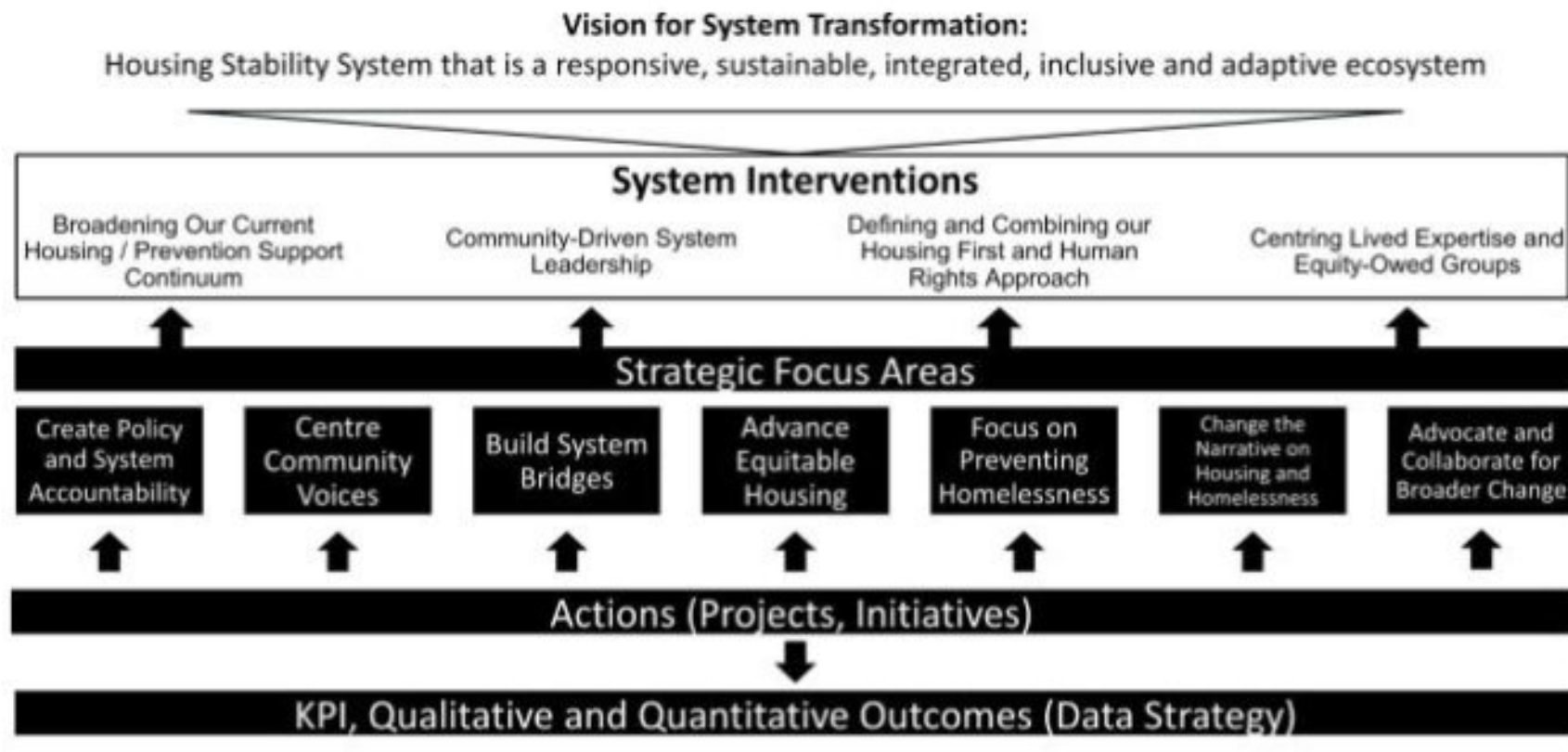


Figure 3. Inside the Plan—PECH High-Level Structure

Our Vision for Housing Stability System Transformation

Our Vision for Housing Stability

System Transformation

We will reach functional zero chronic homelessness by 2030 by transforming the Housing Stability System to be a **responsive, sustainable, integrated, inclusive and adaptive ecosystem**.

To accomplish this transformation and resulting end goal we must intervene at different levels of our systems and communities. We must respond quickly and over the short-term to "branch-level issues" to reduce immediate suffering in our community and we must do our best to address the "root causes of homelessness" to transform the system over time.

To do this Co-Creators and Lived Experts have pointed to key shifts that we hope will transform the system. These "interventions" are proposed in direct response to our learnings from community engagement and environmental scanning.

Mapping the Problem Space to Our Solutions

The Tree Analogy

Early in the process of developing the Plan to End Chronic Homelessness, Lived Experts introduced the analogy / imagery of a tree to describe the causes of homelessness in our community. To properly transform our system and end chronic homelessness we must intervene at different levels of our systems and communities—if we do not we will continue to be in a reactionary state, using downstream fixes for upstream issues. For example: focusing exclusively on the branches results in reactive and short-lived actions. While solutions at the branches level are required, they cannot be the only solutions implemented, otherwise we will perpetuate the status quo. (LE Prototyping Cohort, 2024)

This tree analogy has since been central throughout the Lived Experts Prototyping and broader plan development process. It now acts as a framework for us to align our Problem Space and Solution Space directly:

Problem Space and System Interventions

Problem Space Our Learnings

The current system is not designed or adequately resourced to address the increase in numbers of individuals (volume) requiring support or the increased complexity of needs that individuals have—specifically, those who are precariously housed or experiencing hidden homelessness and those who require deeply therapeutic and supportive housing.

The current structure of siloed and hierarchical decision-making is creating a lack of transparency and trust within the Housing Stability System and the broader community.

Lack of Lived Expertise and Equity Focus is creating system responses that do not align with the needs of the community and is actively causing harm—systems need to sense and see themselves in order for change to occur.

The Province and the Federal government's retrenchment of building community housing in the 70's and 80's has driven a hyper-financialized capitalist model of housing. Increased housing costs are reducing access to housing for broad groups of our population.

BRANCHES & FRUIT (CONSEQUENCES)

Access to services, protocols, rules and regulations, risk management process, research, consultations, etc.

TRUNK (ENFORCING STRUCTURES)

Systems such as laws/courts, policing/criminalization, hierarchies, governments, education, health care, etc.

ROOTS (CAUSES)

Colonization, capitalism, land theft and privatization, spiritual disconnect to land, Western rational thought and dogmatic beliefs, etc.

Solution Space Interventions for Transformation

Broadening Our Current Housing / Prevention Support Continuum

Increased capacity at all levels of current continuum + Broadening the continuum to support deeper level of complexity and to prevent people from falling rapidly into homelessness are reducing access to housing for broad groups of our population.

Community-Driven System Leadership

Establishing a Whole of Community Governance Model that will include Lived Experts, Equity Deserving Groups, System Leaders, ROW Staff. Disseminating system decision-making power to increase transparency, accountability and trust.

Centring Lived Expertise and Equity-Owned Groups

Through this the system will better see itself, avoid future mistakes and be better equipped to acknowledge ongoing trauma, loss and death. Striving for Restoration, Reconciliation.

Defining and Combining our Housing First and Human Rights Approaches

Human Rights needs to be a building block of our community approach to housing—alongside Housing First—and should drive our empathy, action and advocacy.

Figure 4: Tree Analogy depicting the problem and solution spaces of the PECH

Interventions for System Transformation

Responding directly to our articulation of the Problem(s) Lived Experts and Co-Creators identified four (4) High-level System Interventions.

1. Broadening Our Current Housing / Prevention Support Continuum

2. Community-Driven System Leadership

3. Centring Lived Expertise and Equity-Owed Groups

4. Define and Combine our Housing First and Human-Rights Approaches
- (LE Prototyping Cohort, 2024)

These interventions also interact and support each other in different ways. For example, Intervention 1 is outcome driven (the “what”) and meant to react quickly with resources to address current service gaps in the system. However, this continuum of needed housing and supports will shift over time alongside our population and system environment. Interventions 2, 3 and 4 are process-driven (the “how”) and are the methods we use to continuously update and implement in alignment with changing needs in our community.

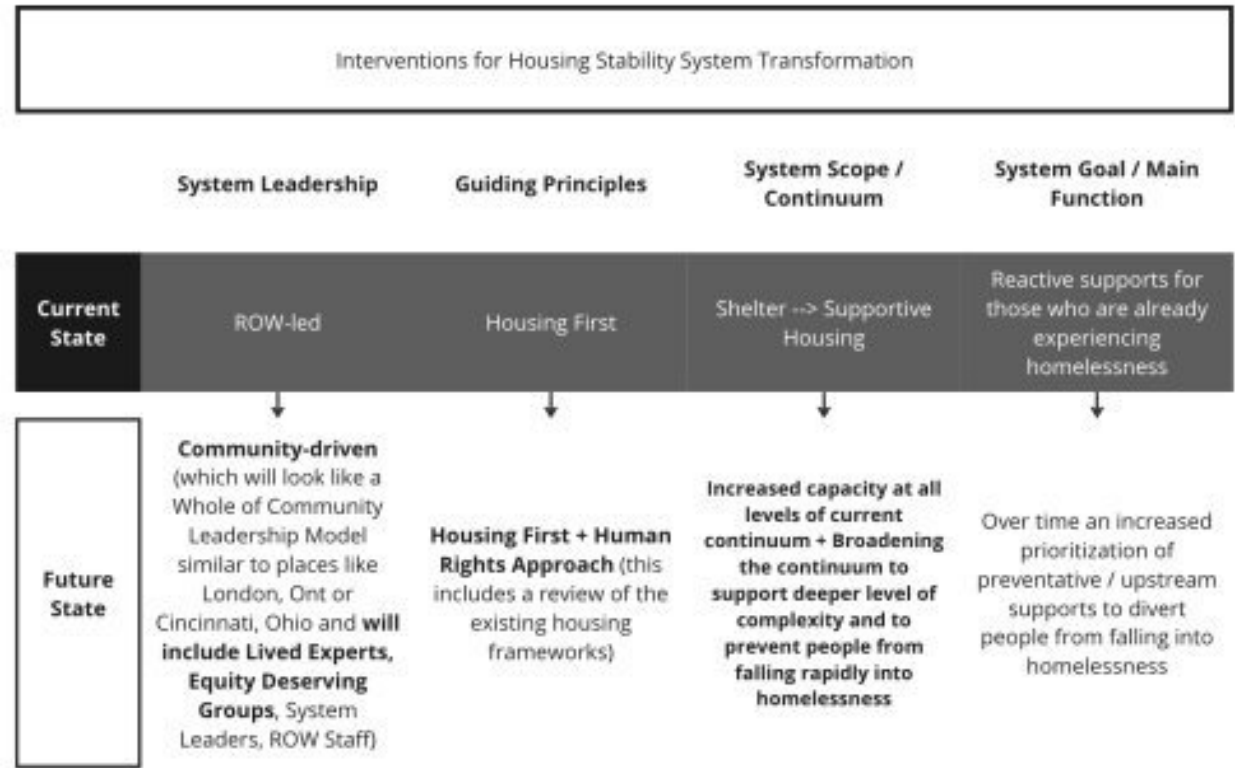


Figure 5. Current State and Future State of Interventions for Housing Stability System Transformation

Intervention 1: Broadening Our Current Housing / Prevention Support Continuum

We will increase capacity at all levels of current housing continuum and we will broaden the continuum to support deeper levels of complexity and to prevent people from falling rapidly into homelessness.

Housing Continuum



Figure 6. Housing Continuum

Prevention and Supports Continuum



Figure 7. Prevention and Supports Continuum

“If we can’t fix whatever led them to homelessness, we aren’t going to solve it”—

Engagement Participant

Intervention 2: Community-Driven System Leadership

We will establish a Whole of Community Leadership Model that includes Lived Experts, Equity-Owed groups, service providers, system leaders, area municipalities and ROW Staff. The goal of establishing community-driven system leadership is to disseminate system decision-making power to increase transparency and trust and responsibility to ensure that the system is built to be accountable to the needs of those experiencing homelessness. We will follow and learn from examples of other communities who have taken a similar approach including London (Ontario), Edmonton (Alberta), and Cincinnati (USA).

We envision this Whole of Community Leadership Model to be built around key governance tables. This new structure would have decision-making power over the implementation of the PECH. The Model will also work toward an integrated systems planning approach. The role of the Region as the Service System Manager remains, but would move from singularly driving these decisions to collaborating and supporting—working alongside the new leadership tables to guide PECH implementation. As diagrammed below, PECH Implementation will be centred on the work of System Interventions and Strategic Focus Area Recommendations. *Also see page 44 - 62 for more details.*



Figure 8. Community-Driven System Leadership Diagram

We are recommending that from April to December of 2024 PECH Co-Creators along with the SDC Prototyping Cohort work to design and implement this Model (LE Prototyping Cohort, 2024). This will include activities such as creating a member Terms of Reference, developing policy and procedure for model operation, etc.

Situating the PECH

The creation of the Whole of Community Leadership Table will allow us to better intersect and coordinate with other sectors and the system planning table. It will be important to have representation from the following groups to ensure we are creating opportunities for enhanced system integration.

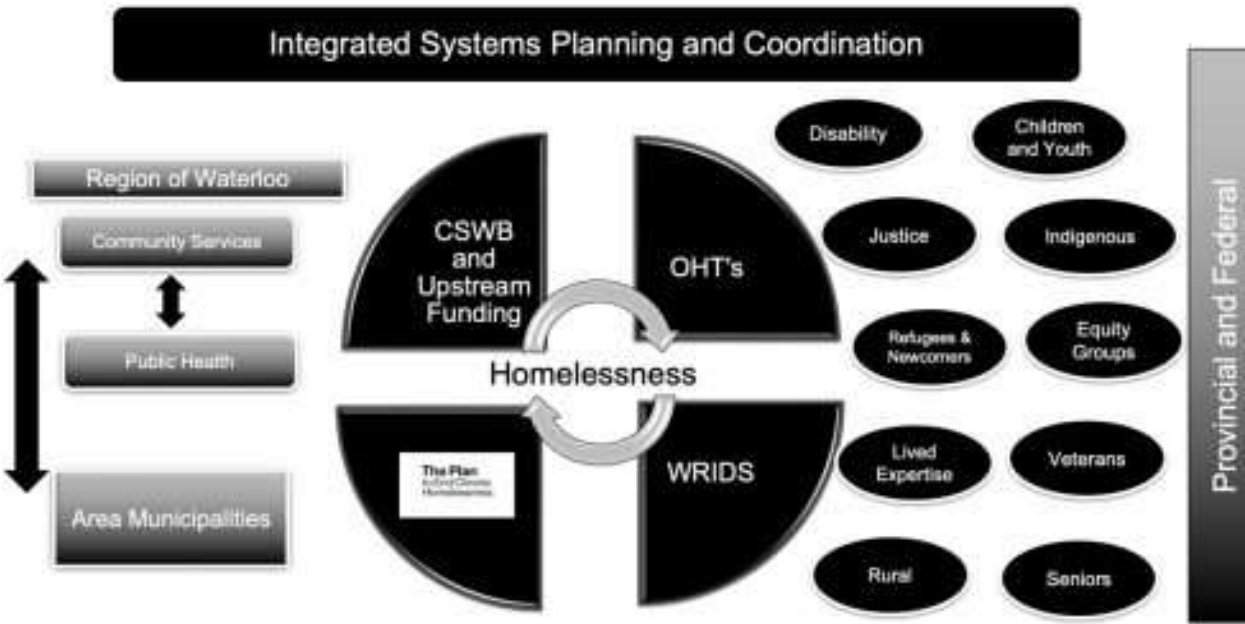


Figure 9. Whole of Systems Coordination Diagram

“Last time implementation was driven by the Region, power dynamics became an issue.” —

Engagement Participant

Intervention 3: Centring Lived Expertise and Equity-Owed Groups

Through this intervention, “the system will better see itself”, avoid future mistakes and be better equipped to acknowledge ongoing trauma, loss and death (LE Prototyping Cohort, 2024). There is deep work to do to restore trust with those who have been marginalized. As well, there is acknowledgement that the system must do better with community members of Indigenous, racialized and intersectional groups where reconciliation and equity is owing in order to have systems of support and resources that go further to move towards an equitable and inclusive whole of community. We will do these through a variety of methods including:



Figure 10. Ways we will centre Lived Expertise and Equity-Owed Groups

“Listen to lived experience.” —Engagement Participant

Intervention 4: Defining and Combining our Housing First and Human Rights approaches

Human Rights needs to be a building block of our community approach to housing (LE Prototyping Cohort, 2024)—alongside Housing First—and should drive our empathy, action and advocacy. **It is important to note that we are not moving away from a Housing First approach, but updating it to match our current context.**

The SDC Lived Experts Prototyping Cohort has defined our Human Rights approach as:

People experiencing homelessness are treated as rights holders, where their agency is respected, and where the Region has a duty of care for their housing needs. Region will be compliant with national and international human rights law and ensure it is appropriately prioritized amidst other legal obligations such as those regarding property rights, privacy and liability. (LE Prototyping Cohort, 2024)

There is work to be done as the PECH is implemented and as the Whole of Community Governance Leadership Model is established to validate this and integrate it with our existing Housing First principles.

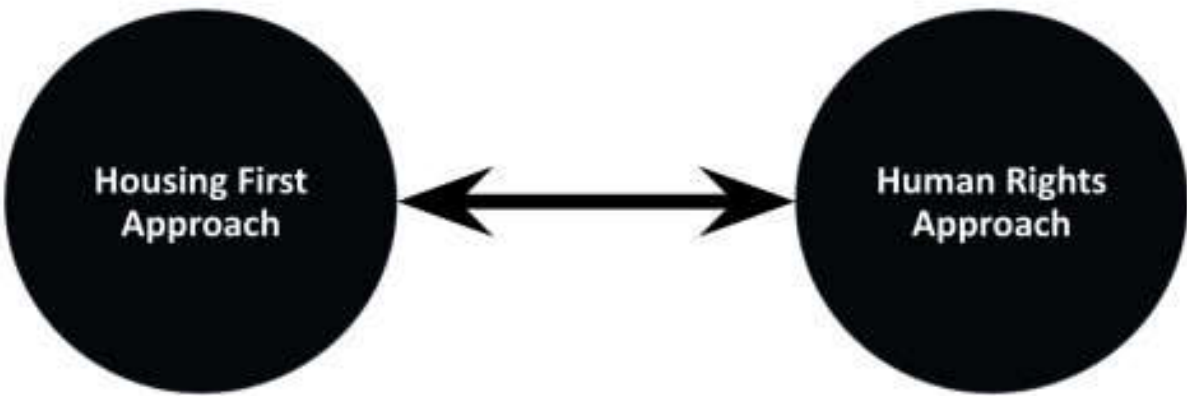


Figure 11. Housing First Approach Integration with Human Rights Approach Diagram

“To say we’re a Housing First community is ringing less-and-less true given the lack of wrap-around health supports that are inherent to the model and critical to its success.” —Engagement Participant

Strategic Focus Areas

Strategic Focus Areas

The below high-level PECH Focus Areas are in *draft form*. They emerged from our collaborative sense-making activities (of our Community Engagement and Needs Analysis) with the Co-Creator Group in August of 2023 and have been refined several times since. These Focus Areas were used as categories to ideate PECH Actions—tangible initiatives that the PECH will outline.

- Create Policy and System Accountability
- Centre Community Voices
- Build System Bridges
- Advance Equitable Housing
- Focus on Preventing Homelessness
- Change the Narrative on Housing and Homelessness
- Advocate and Collaborate for Broader Change

How our Strategic Focus Areas Support our System Interventions

The PECH Strategic Focus Areas, underlying Actions provide tangible descriptions of the work of implementing our High-Level System Interventions. The chart below illustrates how the work of the Strategic Focus Areas advance each for the System Interventions. Black dots indicate where the work of each Focus Area contributes to bringing about each of the System Interventions.

High-Level System Interventions	Strategic Focus Areas						
	Large categories of work / activity within the Plan						
	Create Policy and System Accountability	CENTRE COMMUNITY VOICES	BUILD SYSTEM BRIDGES	ADVANCE EQUITABLE HOUSING	FOCUS ON PREVENTING HOMELESSNES	CHANGE THE NARRATIVE ON HOUSING AND HOMELESSNESS	Advocate and Collaborate for Broader Change
	Strengthen Policy and System Accountability within the HOS and with Adjacent Sectors	Centre Lived Expertise, Racial Justice, Social Justice and shift power relationships	Increase and Broaden Collaboration Within the Homelessness System and with Adjacent Sectors	Create a Variety of Housing to Meet Diverse Needs	Address Both Economic and Social-Economic Causes of Chronic Homelessness	Foster a Shared Community Response	Coordinate our advocacy efforts to bring about broader changes
Broadening Our Current Housing/Support Continuum	●		●	●	●		●
Community-Driven System Leadership	●	●	●		●	●	●
Applying an Intersectional Human Rights Lens to all system attributes	●	●		●	●	●	
Centring Lived Expertise and Equity-Deserving Groups	●	●	●		●	●	●

Figure 12. How each PECH Focus Area contributes to the System Interventions

Focus Area #1: Create Policy and System Accountability

Strengthen Policy and System Accountability within the HSS and with Adjacent Sectors

We will review and update current HSS programs, policies and frameworks. This work will be facilitated by the Service System Manager in collaboration with the Whole of Community Leadership structure and will be ongoing as the PECH is implemented. This work will include ensuring policies and frameworks are integrated with our Housing First and Human Rights approach, applying a gender-based analysis plus (GBA+) lens to homelessness prevention policy, establishing Reconciliation, Equity, Diversity, and Inclusion (REDI) specific strategies and Indigenous-focused reconciliation strategies. There will also be a focus on creating frameworks and MOUs with other systems (i.e. health, justice, etc).

Summary:

- Revise Homelessness & Supportive Housing Frameworks to align with Housing First and Housing as a Human Right principles, emphasizing cultural competency, anti-oppression, and GBA+ lenses.
- Implement a housing-focused Street Outreach Framework and Human Rights Based Approach encampment response protocol to aid those experiencing unsheltered homelessness (LE Prototyping Cohort, 2024).
- Apply an intersectional GBA+ lens to homelessness prevention policies, targeting equitable housing outcomes for women and gender-diverse individuals.
- Expand the Coordinated Access System (PATHS) to improve integration between critical system partnerships, enhancing service pathways, connections, and permanent housing outcomes. Launch a Housing Stability System Data Strategy to monitor progress and establish data-informed decision-making processes.

Focus Area #2: Centre Community Voices

Centre Lived Expertise, Racial Justice, Social Justice and shift power relationships

We will centre community voices by shifting roles, ownership, and accountability in the HSS. This is more than an “amplification” of voices as that suggests we are maintaining systems of oppression—we need to completely redesign how we include interest-holders in this work. Advancing a Whole of Community approach, where lived/living expertise of chronic homelessness, racial equity, and social justice are central in decision-making, funding choices, and policy creation, will ensure the homelessness system will be culturally competent, inclusive, and proactive in addressing systemic harm. For this to succeed, traditional power holders also need to let power transfer to others. (LE Prototyping Cohort, 2024)

Summary:

- Establish All of Community Leadership Table to oversee chronic homelessness plan implementation.
- Develop Lived Expertise process with regional representation for policy review. (LE Prototyping Cohort, 2024)
- Create partnerships, strategies, and funding streams specific to REDI to enhance equitable homelessness response supports and initiatives.
- Expand partnerships and networks to include Black, Indigenous, and Racialized groups, as well as other marginalized communities with intersecting systemic challenges.
- Implement annual funding for community organizations addressing homelessness. (LE Prototyping Cohort, 2024)

Focus Area #3: Build System Bridges

Increase and Broaden Collaboration Within the Homelessness System and with Adjacent Sectors

We will establish greater system collaboration and integration—within and with other sectors including healthcare, justice, rural, income support and other social determinants of health serving systems. Silos are barriers to access—by welcoming and encouraging more collaboration, we can explore and reduce the duplicity of work and barriers to access to enhance system navigability. This means resourcing and advocating for partnerships in the implementation of the PECH to implement trauma-informed and harm-reduction (LE Prototyping Cohort, 2024) solutions that respond to the intersections between the drug and housing crises.

Summary:

- Identify surplus/underutilized land for housing, and partner with municipalities, nonprofits, faith-based groups, and postsecondary institutions to create more housing options and address homelessness. (LE Prototyping Cohort, 2024)
- Integrate health and homelessness services to coordinate efforts with local health system partners to enhance care integration, involving Ontario Health Teams, Public Health, hospitals, mental health providers, and community health programs.
- Support newcomers experiencing homelessness by aligning initiatives with resettlement organizations to provide support for newcomers facing homelessness across the region. (LE Prototyping Cohort, 2024)

Focus Area #4: Advance Equitable Housing

Create a Variety of Housing to Meet Diverse Needs

We will create more variety and quantity of housing offerings that respond to a spectrum of needs—developing an HSS that is accessible and responsive to all including Indigenous led and equity-owed groups. This includes increasing the quantity of our current shelter, transitional housing and supportive housing stock. This is about getting creative with how we create quality housing options for our community—such as repurposing and re-habiting municipal or local structures, developing social enterprises, and establishing community land trusts.

Summary:

- Develop Seniors Strategy within PECH, and collaborate on Rural Homelessness and Veteran homelessness initiatives.
- Increasing supportive housing to address the highest complexity of substance use and concurrent mental health needs. (LE Prototyping Cohort, 2024)
- Building capacity for Indigenous and equity-owed groups to respond to the needs of their communities in a culturally appropriate approach. (LE Prototyping Cohort, 2024)

Focus Area #5: Focus on Preventing Homelessness

Address Both Economic and Social-Economic Causes of Chronic Homelessness

We will address the root causes of homelessness by being preventative and viewing those experiencing homelessness as a whole person (LE Prototyping Cohort, 2024). By focusing on upstream action with key populations such as youth, seniors, veterans, newcomers, students, Indigenous people, those who are gender-diverse and those who identify with a disability we aim to prevent experiences of homelessness. Our goal is to shift the main focus of the HSS from reactive with emergency supports to providing preventative and proactive services and programs.

Summary:

- Partner with municipalities for policies and programs to preserve affordable housing and promote development, reducing chronic homelessness inflow.
- Strengthen eviction prevention via enhanced rent bank and rapid rehousing, aiming for significant inflow reduction.
- Establish a Youth Strategy to address homeless youth needs and prevent future generations' homelessness. (LE Prototyping Cohort, 2024)
- Expand multi-service housing hubs for universal access to support and public space availability for people experiencing homelessness. (LE Prototyping Cohort, 2024)

Focus Area #6: Change the Narrative on Housing and Homelessness

Foster a Shared Community Response

We will change the narrative and increase community empathy and spirit regarding homelessness inequities. This includes a narrative of shared responsibility and action, and a recognition of the many community members of our community currently supporting this shift in narrative and contributing to solutions. Deepening public understanding and providing ways for individuals to see themselves as part of a community approach to ending chronic homelessness in Waterloo Region will create trust, transparency, accountability, and dispel myths and misconceptions about poverty and experiences of chronic homelessness (LE Prototyping Cohort, 2024)—this about is the social change required to support our goal of systemic transformation.

Summary:

- Launch comprehensive public engagement and education initiative targeting partners, government, businesses, and residents to raise awareness of homelessness challenges and responses. (LE Prototyping Cohort, 2024)
- Implement robust Housing Stability System Data Strategy to track progress on ending chronic homelessness, inform decision-making, and support advocacy efforts. (LE Prototyping Cohort, 2024)

Focus Area #7: Advocate and Collaborate for Broader Change

Coordinate our advocacy efforts to influence broader changes

We will combine our advocacy efforts within our community to secure resources and policy changes needed to achieve our goal. To do this we must present a united and coordinated advocacy strategy (LE Prototyping Cohort, 2024), which includes working more closely with Area Municipalities, agencies, faith-based organizations and grassroots advocates. Homelessness is a problem that requires alignment with and support from other levels of government—advocating and collaborating strategically will allow us to affect broader change.

Summary:

- Forge partnerships with schools, universities, and colleges to involve academics in housing strategy development under the Whole of Community Leadership Model. (LE Prototyping Cohort, 2024)
- Integrate PECH activities with local addiction and harm reduction initiatives for holistic support to homeless individuals. (LE Prototyping Cohort, 2024)
- Create and execute an advocacy plan to enhance multi-tiered responses to chronic homelessness. (LE Prototyping Cohort, 2024)

Actions

Actions

Our 30 PECH Actions are clear projects, initiatives, and/or achievements we will work toward. Each Action aligns with one or more Strategic Focus Areas. Below we have grouped Actions by the Focus Group they most strongly align with; however, a key feature of the resiliency and flexibility of our PECH is that progress toward any one Action moves us forward toward multiple Strategic Focus Areas.

It is imperative that these actions be reviewed with an understanding that further work to prioritize them and assign system accountability is necessary and still to come. No one organization, sector, or level of government can solve the crisis of homelessness in isolation. As such, accountability for leading these actions will lie with community organizations, all three levels of government, civil society, and the community leadership table.

Create Policy and System Accountability

- 1.1 Revise current Homelessness & Supportive Housing Frameworks to ensure all Housing Stability System programs/services operate according to Housing First and Housing as a Human Right principles, cultural competency, anti-oppression, gender-based analysis plus (GBA+) lenses and ensure that equity and reconciliation are centred within all system frameworks. (LE Prototyping Cohort, 2024)
- 1.2 Implement a housing-focused Street Outreach Framework and a Human Rights Based Approach encampment response protocol (LE Prototyping Cohort, 2024) to better support people living rough/experiencing unsheltered homelessness.
- 1.3 Apply an intersectional gender-based analysis plus (GBA+) lens to homelessness prevention policy and strategies to ensure equitable housing outcomes are advanced for women, and gender-diverse individuals and communities.
- 1.4 Expand the local Coordinated Access System (PATHS) to enhance integration and coordination between health, addictions, mental health, acquired brain injury, justice, income support, child welfare, and other critical system partnerships to increase service pathways, service connections, and permanent housing outcomes.
- 1.5 Implement a Housing Stability System Workforce Strategy, across the region, to ensure a professionalized and healthy workforce. We will advance salary and benefit compensation, employee well-being and retention, as well as training and professional development.
- 1.6 Launch a Housing Stability System Data Strategy to monitor and track progress on ending chronic homelessness and establish data-informed decision-making processes.
- 1.7 Implement a User Experience Strategy, across the region, to ensure system service users are supported in all Housing Stability System programs and services. (LE Prototyping Cohort, 2024)
- 1.8 Create a climate and extreme weather protocol based on a human rights approach. (LE Prototyping Cohort, 2024)

Centre Community Voices

- 2.1** Establish an All of Community Leadership Table to lead the implementation of The Plan to End Chronic Homelessness recommendations and perform ongoing assessments of activities and progress towards our community's goal of ending chronic homelessness by 2030 . The work of the All of Community Leadership table will be to ensure systems and strategic planning integration that work together to end chronic homelessness. This will include: Ontario Health Teams Strategic Plans, Region of Waterloo Strategic Plan, Waterloo Integrated Drug Strategy, Rural Upstream Collaborative-Engage Rural and the Community Safety and Wellbeing Plan.
- 2.2** Develop a comprehensive and integrative Lived Expertise process, including establishing a Lived Expert Working Group, with representation from across the region, to support ongoing learning and system reviews of organizational and system policies and processes. (LE Prototyping Cohort, 2024)
- 2.3** Establish REDI-specific partnerships, strategies and funding streams to advance equitable homelessness response supports and initiatives to build capacity.

REDI work is inclusive of not only Black, Indigenous, and Racialized groups, but also groups where there is established systemic intersectionality. These partnerships, relationships and networks are currently lacking and must be expanded to a great extent. Where work is currently underway such as with Black communities, Indigenous communities, communities supporting physical disabilities, developmental disabilities, acquired brain injury, people living in rural areas, as well as, people experiencing criminalization in the Justice system, these relationships must be built out and resourced in order to flourish.

- 2.4** Establish an annual funding application and review process for community organizations, across the region, to support emerging ideas and prototypes to respond to homelessness. (LE Prototyping Cohort, 2024)

Build System Bridges

- 3.1** | Identify surplus/underutilized land(s) with the intention of creating more housing options and respond to unsheltered experiences of homelessness, across the region. We will do this through partnerships with area municipalities/townships, not-for-profits, faith-based organizations, and postsecondary institutions. (LE Prototyping Cohort, 2024)
- 3.2** | Establish specific health-related coordination efforts, processes, and supports with local health system partners to create a more integrated health and homelessness system of care. This includes embedding the work of the PECH within the local Ontario Health Teams, Public Health programs, local hospitals, mental health and addictions providers, community health programs, and other health system programs across the region.
- 3.3** | Align the PECH and related initiatives with local resettlement organizations and services to support Newcomers to Canada experiencing homelessness across the region. (LE Prototyping Cohort, 2024)

Advance Equitable Housing

- 4.1 Implement Indigenous homelessness and Indigenous-focused reconciliation strategies, led by Indigenous groups and leaders, to enhance permanent housing outcomes for Indigenous communities and support generational healing, guided by Key Concerns identified through Wellbeing Waterloo, Truth and Reconciliation Commission Calls to Action, The National Inquiry into Missing and Murdered Indigenous Women and Girls Calls to Justice, and the United Nations Declaration of the Rights of Indigenous Peoples.
- 4.2 Expand on use of existing community housing stock to increase permanent housing outcomes for individuals experiencing homelessness; including the use of community housing units to support people who have recovered from their experience of homelessness to leave Supportive Housing
- 4.3 Create new permanent Affordable and Supportive Housing to meet current and future housing needs to end chronic homelessness. This includes deeply therapeutic and harm reduction-focused Supportive Housing to ensure those with the greatest depth of need are supported to stay housed. (Our current 570 Supportive housing units are meeting 50% of our current need) (LE Prototyping Cohort, 2024)
- 4.4 Create a Seniors Strategy, embedded within the broader PECH, to respond to the unique needs of Seniors experiencing homelessness, including but not limited to addressing lack of social connection and income support for Seniors experiencing or at risk of experiencing homelessness due to a lack of affordability in the private market and appropriate housing options.
- 4.5 Co-Create with rural based agencies a Rural Homelessness strategy and actions, embedded within the border PECH, to address the unique needs of people at risk of or experiencing homelessness in each of the four Townships.
- 4.6 Implement alongside system partners, a housing-focused strategy with dedicated resources to end Veteran homelessness.

Focus on Preventing Homelessness

- 5.1** Reduce inflow into chronic homelessness by working with area municipalities to implement policies and programs focused on mitigating the loss of affordable housing in the private market, while continuing to incent affordable housing development. (LE Prototyping Cohort, 2024)
- Expand on inflow prevention and eviction prevention work through the expansion of the rent fund, eviction prevention (from all housing including supportive and community housing) and rehousing services to significantly reduce inflow into chronic homelessness.
- 5.2** Create a Youth Strategy, embedded within the broader PECH, to respond to the unique needs of youth experiencing homelessness and develop upstream approaches that target youth at risk of experiencing homelessness and end generational experiences of homelessness. (LE Prototyping Cohort, 2024)
- 5.3** Expand and create new multi-service agency housing hubs across Waterloo Region to ensure universal access to community-based supports that increase housing stability and for public spaces to be readily available for individuals experiencing homelessness outside of shelter operating hours. (LE Prototyping Cohort, 2024)

Change the Narrative on Housing and Homelessness

- 6.1** Launch a comprehensive public engagement and education strategy for partners, Council, area municipalities, provincial and federal government, businesses, and residents to increase awareness and understanding of homelessness related challenges and responses. (LE Prototyping Cohort, 2024)
- 6.2** Implement a comprehensive Housing Stability System Data Strategy to monitor and track progress on ending chronic homelessness and establish data-informed decision-making processes. This resource will also be leveraged to support advocacy efforts and inform our community of the realities of homelessness. (LE Prototyping Cohort, 2024)
- 6.3** Establish an ongoing memorializing process for those lost to homelessness. This includes partnering with interest-holders in the Housing Stability System, Lived Experts, Mutual Aid Groups, Unsheltered Communities, and the Coroner's Office. (LE Prototyping Cohort, 2024)

Advocate and Collaborate for Broader Change

- 7.1 Strengthen partnerships with school boards, local universities and colleges to ensure that professors and academics in multiple fields are engaged in developing upstream education programs on the risks of homelessness. (LE Prototyping Cohort, 2024)
- 7.2 Align the All of Community Leadership Model and PECH activities with existing addictions, substance use, and harm reduction community-led initiatives to ensure integrative supports for individuals experiencing homelessness active in their substance-use. This includes alignment and integration with WRIDS, Public Health, and other community-based services and supports across the region.
- 7.3 Develop and implement a coordinated advocacy and inter-governmental relations plan to strengthen a multi-tiered response to chronic homelessness. (LE Prototyping Cohort, 2024)

Investment Strategy 2024–2030

Investment Strategy 2024-2030

To respond to the growing homelessness and affordable housing crisis, the Region of Waterloo is directing unprecedented investments towards programs, supports, and capital projects to meet the needs across the community. In 2024, the Region of Waterloo will invest more than \$245 million into Affordable Housing and Homelessness, including capital and operating investments, from all sources of funding. Of the approximately \$245 million invested across the housing continuum, 23% is directed towards homelessness and supportive housing programs.

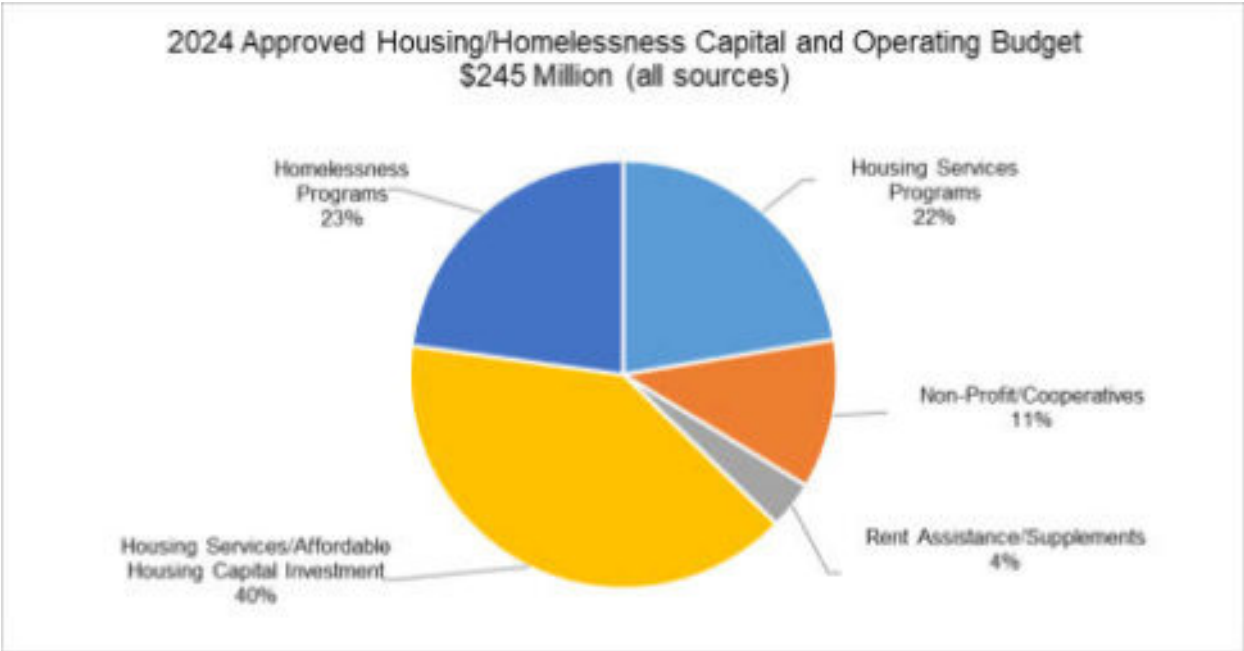


Figure 13. highlights the current investment by the Region of Waterloo, from all sources, in Housing and Homelessness. Of the \$245 million invested in 2024, 23% is directed towards Homelessness and Supportive Housing.

Between 2019 and 2024, the Region has increased municipal tax levy and reserve investment in this critical service area from \$42 million to approximately \$99 million, signalling a deep and historic commitment to achieving homes for all in Waterloo Region. This level of municipal commitment to homelessness and affordable housing is unique when compared to other Regional governments and System Service Managers in Ontario.

To reach a functional end of chronic homelessness in Waterloo Region, significant capital and operating investments are required from all levels of government. It is estimated that a total capital investment in emergency shelter, transitional housing and

supportive housing of \$110M will be required. Operating expenditure increases of approximately \$5M - \$8M annually for the next six years in order to fully implement the Plan can be expected. The range will depend on the extent and nature of capital financing costs required to meet the needs of the community at that time.

The staggering investment needed to address this growing crisis is required from all sectors and levels of government. To achieve an end to chronic homelessness in Waterloo Region, a deepening of commitment and engagement is needed from all levels of government, public and private sector, and key system partners (healthcare, mental health and addictions, justice, etc.). This shared community challenge is not to be owned or solved by one order of government in isolation.

The Investment Plan and Strategy address the immediate community needs and plans for a more stable and outcomes-focused future where every resident of Waterloo Region has a place to call home. This Investment Plan and Strategy shifts the collective focus from reactive emergency-based responses to upstream intervention and permanent solutions. We will shift our collective approach from managing homelessness to ending it.

Shifting the Collective Focus: Managing Homelessness to Ending It

The significant investment into homelessness services and programs cannot be overstated. At approximately 23% of the total investment made by the Region of Waterloo into Affordable Housing and Homelessness, this level of commitment and investment is unprecedented. \$56 million will be invested into homelessness and supportive housing programs in 2024. Despite this significant and encouraging commitment and investment into the local Housing Stability System, currently the majority of funding is dedicated towards reactive and emergency-based responses as the local crisis of homelessness continues to rise at alarming rates. The Plan to End Chronic Homelessness sets out to shift the collective focus towards permanent housing outcomes and upstream interventions so the significant investments being made into the system have a greater return on investment and, most importantly, create permanent housing outcomes for the most vulnerable residents of Waterloo Region.

Current State: Managing Homelessness

Inspiring homelessness prevention and supportive housing work happens on a day-to-day basis across the Housing Stability System and this work cannot be undervalued or overlooked. Since 2019, the Housing Stability System and related investments have been directed towards managing the growing homelessness crisis, including the development of hundreds of emergency shelter beds, increasing street outreach, and hybrid shelter models.



Figure 15. Current state: Managing Homelessness

Future State: Ending Homelessness

As the Plan begins to be implemented, the strategic shift that is required is moving towards a system that is focused on ending homelessness rather than managing it. This means investing resources towards preventing chronic homelessness and creating permanent housing options and outcomes. This shift does not mean reducing service standard levels for individuals experiencing homelessness rather, the intention is to strengthen efforts to meet the needs of individuals and families experiencing homelessness so their experiencing of homelessness can be brief, rare, and non-recurring.

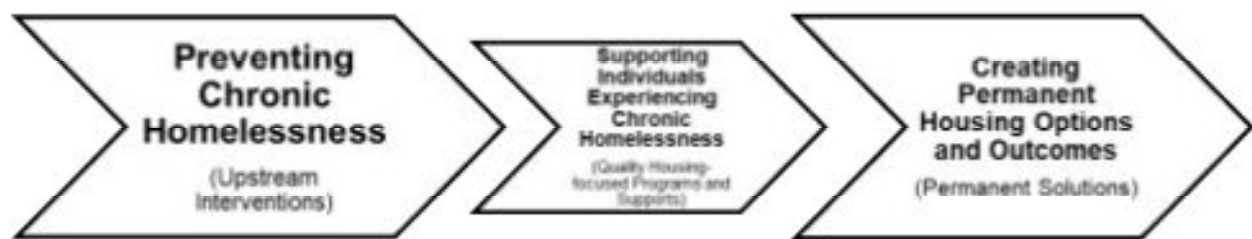


Figure 16. Future state: Ending Homelessness

Tracking Our Progress

KPIs, Outcomes, Solutions and Experiences

Tracking Our Progress—KPIs

As a Built for Zero community (<https://bfzcanada.ca/getting-to-zero/>) we know that the path to ending chronic homelessness is best supported by a data-driven and collaborative peer-learning approach. We also know from other Built for Zero communities that experiencing homelessness is not about having bad luck or the result of individual choices, it is a systems problem that is solvable.

Waterloo Region has achieved a quality by-name list of people experiencing chronic homelessness and a Reaching Home ([About Reaching Home: Canada's Homelessness Strategy](#)) defined coordinated access system (that works to ensure that those with the greatest depth of need are prioritized for housing vacancies). These are key milestones that work towards ensuring we have the data to understand the scope of the issue, help to make data-informed decisions, and measure progress towards ending all experiences of chronic homelessness.

Establishing and monitoring key performance indicators (KPIs) will be an essential part of the implementation of the Plan to End Chronic Homelessness, and will be a collaborative responsibility amongst various community and system partners who will make up the All of Community Leadership Table.

We need to set measurable goals and measure progress. We also need to prioritize investments that will help us achieve our goals.

As outlined in the investment strategy, we know that more financial resources and attention need to be put to Preventing Chronic Homelessness and Creating Permanent Housing Outcomes. The more we can invest in preventing experiences of chronic homelessness (Focus Area #5) and accelerate permanent housing outcomes from experiences of chronic homelessness (Focus Area #4), the faster we will achieve our community's goal of Functional Zero chronic homelessness.

Establishing performance indicators and measuring our communities progress towards achieving functional zero chronic homelessness will rest within three areas:

- 1) **Inflow** - Preventing Experiences of Chronic Homelessness: how are the programs, services, and interventions within our community working together to prevent experiences of chronic homelessness to occur?
- 2) **Active** - Supporting Individuals Experiencing Chronic Homelessness: how are the strategies and actions of our community working to reduce the overall number of people experiencing chronic homelessness?

- 3) **Outflow** - Creating Permanent Housing Options and Outcomes: how are investments in permanent housing and permanent housing with supports (Supportive Housing) supporting people to quickly and permanently end experiences of chronic homelessness?

We know that racialized, black, and Indigenous communities are overrepresented amongst people experiencing homelessness. As part of the work to establish community performance indicators, it will be essential to better collect, report on, and act on identity based data. We will need to work alongside Indigenous, black, and racialized communities to better understand and address the disparities and disproportionalities as we work to create equitable systems that work together and serve the housing, health, and human needs of all community members. At the heart of this work will be creating and nourishing relationships with equity-owed groups to better understand their community's experiences of homelessness, and supporting these communities' self-determined priorities and actions to address homelessness within their community.

Change Management Approach

Change Management Approach

Our change management approach consists of five elements:

- **A set of Shared Principles for Change**—these principles will guide those working to implement the PECH.
- **An integrated systems planning approach**—this will be achieved through the formation of a Whole of Community leadership Table that includes the Region of Waterloo (SSM), Area Municipalities, community leaders and lived experts and equity-owed groups/sectors.
- **An investment in the Equipping of Community Leaders and ROW Staff** to practise and implement change management, providing a path forward for authentic system transformation.
- **The Two Loops Model of Systems Change** is a nonlinear theory of system change. It provides a useful framework to understand the transformation process occurring within the HSS.
- **Short-term Action Plan and Next Steps** to keep the work and momentum moving forward

Shared Principles for Change

By following and enacting our **shared principles** to inform our decision-making, guide our behaviour and shape our values as a community:

- Have Lived Expertise Leadership throughout to help the system see itself
- Champion Intersectional Human Rights
- Prioritize Human Well-being Over the Financialization of Housing
- Reform governance and service systems
- Solutions must be for and by equity-owned communities
- Commit to Safe Housing First

(LE Prototyping Cohort, 2024)

Incorporate Lived Expertise Leadership Throughout

- Through this the system will better see itself (LE Prototyping Cohort, 2024) and be further equipped to acknowledge ongoing trauma, loss and death.
- Incorporating lived expertise leadership ensures our past mistakes are not repeated and enables us to try new approaches from a bottom-up approach.
- Homelessness is a wicked problem meaning that it is highly complex. To solve complex problems we must explore, test, and iterate to find solutions. This work requires committing to responsive adaptation and a recognition that "messy is a process." (LE Prototyping Cohort, 2024)

Champion Intersectional Human Rights

- Human Rights needs to be a building block for our community approach to housing and should drive our empathy, action and advocacy. (LE Prototyping Cohort, 2024)
- There are deep wounds that need to be healed in our community. Restorative conflict resolution offers a possible pathway. (LE Prototyping Cohort, 2024)
- Recognize that everyone involved brings their whole self to this work of reconciliation - by using the mind, heart, body and spirit to take appropriate actions and rebuild communities of care. (LE Prototyping Cohort, 2024)
- Intersectionality must also be a core tenant of our approach as each individual's story and situation is unique and must be accommodated for. (LE Prototyping Cohort, 2024)
- Decriminalize poverty and homelessness – policing, bylaws enforcement, risk management, policies and procedures (e.g., neo-vagrancy bylaws) to be either removed or transformed to benefit the poor and the homeless. (LE Prototyping Cohort, 2024)

Prioritize Human Well-being Over Financial Gain

- An economic and value shift is required related to our perception of housing. Currently, being over-housed is a measure of success in our current society. (LE Prototyping Cohort, 2024)
- "Housing is both a human right and a speculative commodity from which to extract wealth. Therein lies the crux of the housing problem. Until we fully reconcile these contradictory roles that housing plays, we will be in a perpetual state of crisis."—(Doucet, McDougall and Jay 2023) (LE Prototyping Cohort, 2024)
- Challenge the appropriation and privatization of the Indigenous land – partner with the Six Nations of the Grand River, Haudenosaunee Confederacy Chiefs Council, and local First Nations, Inuit and Metis communities and release public lands for alternative housing solutions outside of the private market to Indigenous-led groups, while providing capital funding and capacity building support.

Reform governance and service systems

- Requires a redistribution of power and resources to lived experience groups, equity-owned groups, and community-based entities for the irreplaceable work they do alongside service providers. (LE Prototyping Cohort, 2024)
- ROW/SSM role/responsibility for systems accountability/coordination and funding allocations will also include backbone support to the community systems table rather than singular decision-maker through the Whole of Community Leadership Model.
- By focusing at the trunk and root levels of this issue we will create change—funding sustainable prevention, committing to continual and intentional evaluation of solutions and leveraging data and evidence to inform our decisions and discussions (LE Prototyping Cohort, 2024)

Rebuild communities and involve the capacity of the whole community

- Redirect/invest resources to equity-serving organizations that are doing this work and are led by deserving groups to ensure a “for them, by them” approach is taken for increasing service system capacity. (LE Prototyping Cohort, 2024)
- Homelessness is an equity issue, as such we need to include non-traditional partners, systems and voices in decision-making. By leveraging the collective intelligence and experience in our community we will solve this community problem. (LE Prototyping Cohort, 2024)

- View residents, support groups, advocates, and activists as a part of the continuum of care that reaches from informal to formal system supports, with both types of support complementing each other. (LE Prototyping Cohort, 2024)
- A collaborative or co-design solutions approach is imperative to build trust with those in the community most impacted by homelessness and for others in the community to see themselves as a part of solutions. (LE Prototyping Cohort, 2024)

Commit to Safe Housing First

- Housing First (HF) will remain an important foundation to our Community Approach to Housing, however it needs to be reviewed/refined with a Human Rights approach. HF must be updated to match our current context and to ensure it is not perpetuating harm to individuals we are trying to support. The application of HF currently prioritizes permanent and supportive housing solutions, flexible wrap-around supports, and integration of health supports. To further implement HF alongside a Human Rights approach requires self-determination and choice to be upheld during experiences of homelessness and for this to continue once someone is housed. (LE Prototyping Cohort, 2024)
- Rethink public land both as a source of housing and reframing it as a health support. Right now, anybody who is rendered homeless has nowhere to be legally. Which directly impacts their health. How might we integrate those two possibilities to consider a lack of housing as a health issue fundamentally? (LE Prototyping Cohort, 2024)
- Tailoring solutions to housing (i.e. integrated health supports that address social determinants of health) that meet a specific need is integral to keeping people housed.

Whole of Community Leadership – Integrated Systems Planning

The creation of a Whole of Community Leadership structure is a key element in the change management process for PECH. The change management goal is to transform the way in which the work of ending chronic homelessness is done in Waterloo Region. This structure will empower the community to have greater input and influence into prioritizing investments and actions needed to transform the Housing Stability System to achieve the vision set out in PECH.

At present this is a conceptual model that will be co-developed. The community leadership model would include the following:

- Membership will include the ROW as the Service System Manager(SSM), Area Municipalities and leadership from key sectors and groups that represent the diversity of the community voices that are needed to provide guidance into the implementation of the PECH.
- The role of the SSM will continue to oversee their mandated responsibilities for funding allocations and ensuring accountability to the system frameworks and outcomes.
- Moving to a community systems leadership mode will require more work to be done in defining the distinct and respective roles and responsibilities through a terms of reference. This work will be done in collaboration with the members of the current Co-Creator Table while continuing to invite broader representation from the community that will reflect the context of Waterloo Region.
- Establishing a community systems leadership model will ensure that the implementation of PECH will maintain an adaptive and inclusive leadership that is needed to respond to the current complexities and future challenges of chronic homelessness.
- Dedicated change management process will be required to help table partners to identify the differences of power and influence that they represent. The process must address cultural understandings and lived experience of community partnership that have been hindered by legacies of power and privilege. The goal is to create a new approach and collaboration that both respects the roles and responsibilities ascribed with embracing transparency for change and inclusion on the work to end chronic homelessness. (LE Prototyping Cohort, 2024)

Whole of Community Leadership Conceptual Model

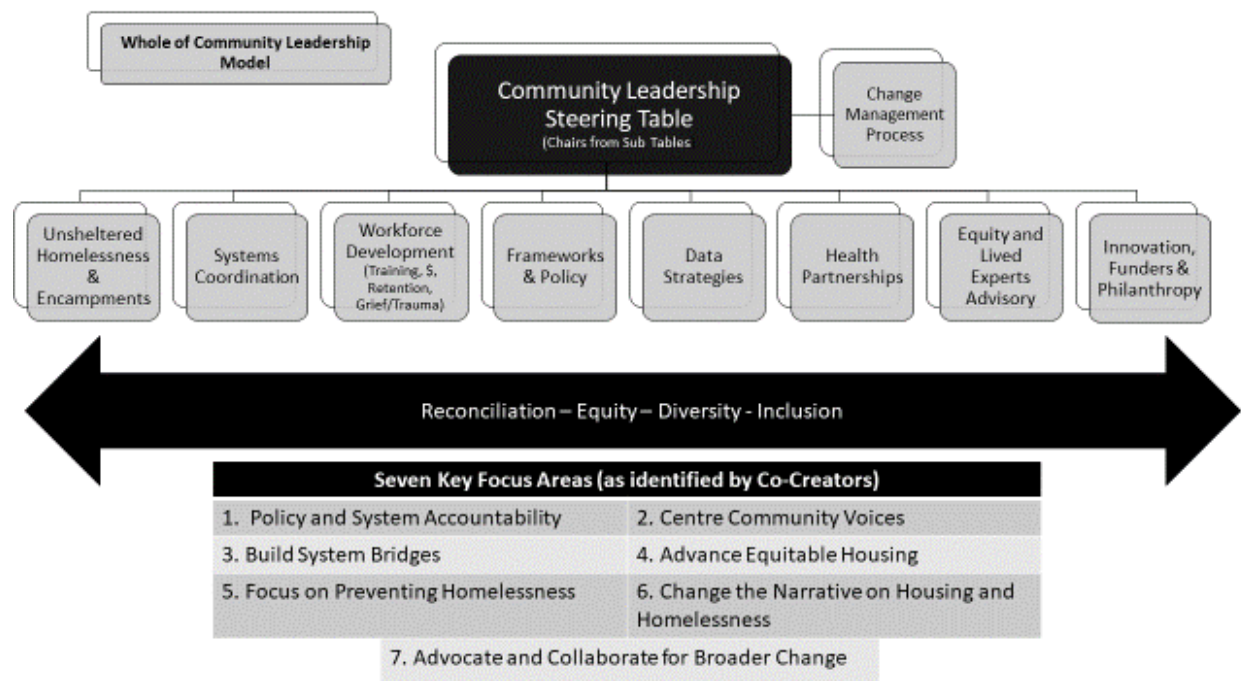


Figure 17. Conceptual Community Leadership Steering Table

An Investment in the Equipping of Community Leaders and ROW Staff

An investment in the Equipping of Community Leaders and ROW Staff to practise and implement change management, providing a path forward for authentic system transformation.

“**Nothing changes unless people do.**” concluded Scott Keller and Bill Schaninger when their 2019 research indicated that around 40% of change management failure is related to employee resistance and almost 35% to management behaviours that didn’t support change. *This is* a staggering display of how much people affect the outcome of change. 70% of change programmes fail. A large part of this sits with the leadership team and their ability to develop themselves and their people throughout the change. This is about seeing leaders as enablers of change rather than change agents, where their focus needs to be on creating an environment that encourages and facilitates change.” (Short, 2021)

The SDCWR Prototyping community of practice, which engaged marginalized voices with lived experience as well as SDCWR and ROW staff, discovered:

- That we as leaders, “get to go first” and model a way forward for others. There are no shortcuts.
- That this work is first and foremost relational work, requiring that we are present to ourselves, compassionate with one another, and passionate about finding and activating the best way forward for all. (LE Prototyping Cohort, 2024)
- The importance of the ongoing investment of time and energy in creation of the conditions that encourage and facilitate adaptive change. This year long investment resulted in the evolution of prototypes which sought to address the problem of chronic homelessness. Prototype groups continue to adapt as they learn and respond to changing contexts and unanticipated challenges. (LE Prototyping Cohort, 2024)

Ronald Heifetz, Marty Linksy, and Alexander Grashow are credited with developing the *Adaptive Leadership* framework. The framework distinguishes between technical fixes and adaptive change. When the problems we are seeking to solve overwhelm us, we often seek technical fixes, rather than placing ourselves on the necessary path of adaptive change. Change management requires us to appropriately transition from the application of shorter-term technical fixes to longer-term work of adaptive change. Technical issues rely on protocol, procedures, rules and regulations to solve them. Adaptive challenges, on the other hand, depend on dynamic, people-focused solutions. Responding adaptively is long-term, relatively simple and challenging to maintain over time. These ideas are based on the following quotes.

“The most common leadership failure stems from trying to apply technical solutions to adaptive challenges.”

The Practice of Adaptive Leadership: Tools and Tactics for Changing Your Organization and the World, Ronald A. Heifetz, Marty Linsky, Alexander Grashow, 2009, Harvard Business Review Press

“We look for solutions that are complex, easy, and quick when mostly they are simple, difficult, and long-term.”

ALL: CHANGE - Unlocking Kingdom Potential in a World We Weren't Prepared For, Rich Robinson, to be released Sept 2024, 100 Movements Publishing

As part of the implementation of the Plan to End Chronic Homelessness, leaders must apply an *Adaptive Leadership* approach to guide housing stability system transformation. Along with addressing immediate concerns through technical fixes, they must also attend to the adaptive challenges which most often arise in crises, do not respond to previously applied solutions, and require multiple parts of a system to engage what are often competing perspectives and priorities.

Figure 18, describes the shift from *Technical* to *Technical and Adaptive* and eventually to *Adaptive* Challenges. The final row, describes the problem definition, solution and locus of work in a system that is wholly proactive and able to fully adapt. At this point in time, PECH will require both technical fixes (reactive) and respond to adaptive challenges (proactive).

We have started this work/approach through the SDCWR PECH 2023 community of practice. It will need to continue and expand to other leaders in order to implement the plan. Community and ROW leaders who implement change management must be well equipped to know when and how best to apply a technical fix and to know when and how to respond adaptively. Reaching Functional 0 Chronic Homelessness in Waterloo Region is an adaptive challenge while sub-elements of the challenge may be Technical and Adaptive. This means that a learning mindset is important throughout and that the locus of work should be with interest-holders. (*Adaptive Challenges*, n.d.)

Technical vs Adaptive Challenges			
Challenge	Problem Definition	Solution	Locus of Work
Technical	Clear	Clear	Authority
Technical and Adaptive	Clear	Requires learning	Authority and Interest-holders
Adaptive	Requires Learning	Requires Learning	Interest-holders

(*ADAPTIVE LEADERSHIP*.; n.d.)

The only way to ensure that the PECH will result in long-term, sustainable change, is to equip community leaders and ROW staff to practice and implement change management; or else we’re at risk of collectively creating results that no one wants. Any leader who holds responsibility for PECH results, must invest with others to tend to both the individual leadership awareness and to strengthen their change management competencies. To not invest in leaders for the well-being of our community puts them at risk of being out-of-step and blocking the results we’re collectively wanting to achieve. The work of transformational change, to move from current state to the desired future state, will often be met with moments of challenge that can feel “messy”. It is critical that leaders understand this is part of the journey of learning and is not an indication that the approach is wrong or failing. It is rather an indication that change is happening.

Investment in the equipping of Community Leaders and ROW Staff must include but not limited to:

- Community Leaders and ROW staff who have primary decision-making responsibility.
- Participation in a community of practice over the next 18 months that is intentional, rhythmic and sustainable over time (ie. a commitment of two hours per month, with the expectation that this community of practice is part of each leader's responsibility and role).
- Attention to interior work of leaders, inviting self-awareness and clarity of intention. (LE Prototyping Cohort, 2024)
- attention to strengthening the competencies required to manage change well, ensuring that leaders have the requisite knowledge and ability for their particular role (e.g. PROSCI Change Management training might be a helpful starting point)
- a robust and accountable “action-reflection” cycle, which reinforces the increase in leaders nurturing adaptive responses to problems, rather than technical fixes.

Otto Scharmer, senior lecturer at the Massachusetts Institute of Technology (MIT) and co-founder of the Presencing Institute notes that all systems thinking starts with distinguishing the symptoms (above the surface) from the root issues (below the surface). A leader needs to do more than just react against symptoms, they seek to understand the root issues in order to drive awareness-based systems change.

Otto summarizes this with four principles:

- *You can't understand a system unless you change it.*
- *You can't change a system unless you transform consciousness/mindset. You need to address all symptoms and root issues.*
- *You can't transform consciousness unless you make a system see and sense itself.*
- *You can't transform a system unless you sense and actualize the emerging future.*

The essence of leadership is stepping from one territory into another. It's our collective responsibility to learn from the past and connect it to emerging future possibilities.

If authentic and sustainable change is to be achieved, an investment in leaders will be required. Along with the system's investment in them, leaders must also be willing to invest in themselves, strengthening their capacity to lead boldly and engage others with competence and care.

The Two Loops Model of Systems Change

The two loops model is helpful as it acknowledges the reality that we need to invest in solutions that are part of the current system (branch-level solutions) to respond to current suffering and challenges in our community, while simultaneously focusing on transforming contributing system structures (trunk and roots).

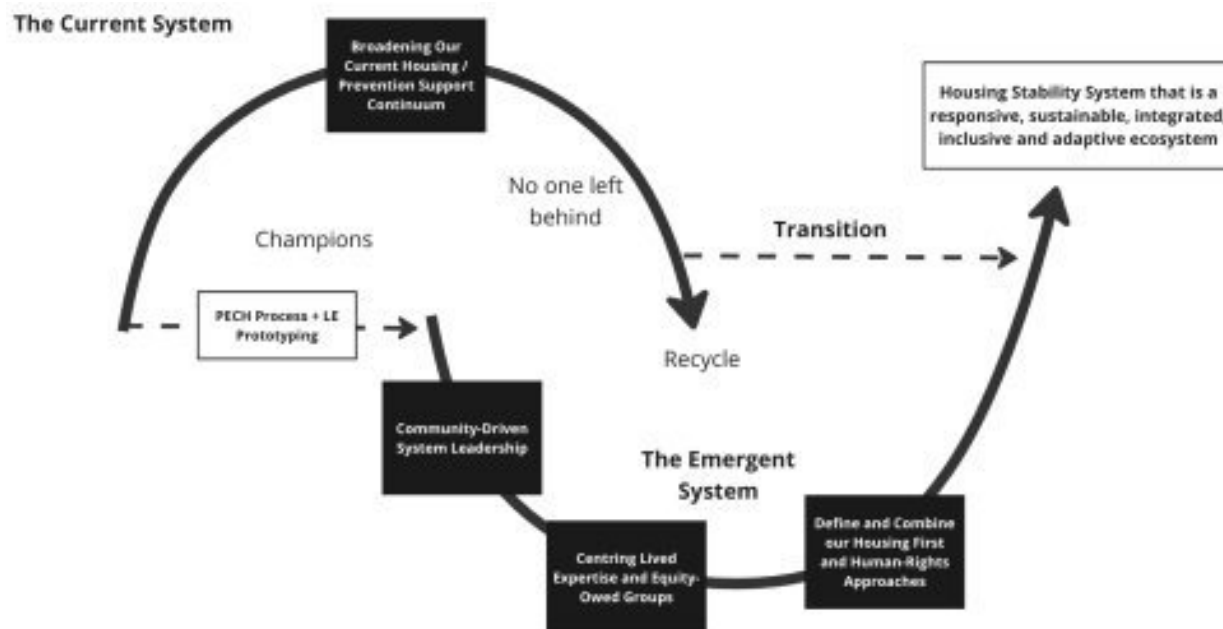


Figure 18. Two Loops Model of Systems Change Diagram

The **Two Loops model** is a nonlinear theory of change. It provides insight into the simultaneous growth and decline processes that are underway within a system during a transition period. It offers a conceptual framework for better connecting the past to the future during change.

- **Champions**—The Two Loops model reaffirms the importance of change agents/champions and their ideas. It provides a pragmatic approach for supporting them, including naming, connecting, nourishing, and illuminating them.
- **No one left behind**—Seeding opportunities for everyone to flourish in an emergent system- particularly those who have been excluded or harmed in the past – is important to its stability and long-term viability. It is also important to assist those who are prospering within the dominant/incumbent system as they are the ones who are most likely to oppose the desired change that is emerging.

- **Recycling**—The model suggests a need to carry forward lessons from the incumbent/dominant system to the new/emergent model. That way, we can maintain and find comfort in the valuable connections to the past, while ushering in new practices.

(Berkana Two Loop Model: A Quick Introduction to an Accessible Model for Systems Change, 2023) (Rose, n.d.)

To stimulate and manage change:

- Name the champions
- Connect them together
- Nourish them, with time, connection and resources
- Illuminate their work, or stories of change

“Never doubt that a small group of thoughtful, committed citizens can change the world; indeed, it is the only thing that ever has” (Margaret Mead, circa 1982).

Short-Term Action Plan and Next Steps

2024			2025
Q2	Q3	Q4	
Monthly Meetings of the Co-Creator Cohort: - Design and implement the Whole of Community System Leadership Model - Work on implementation and prioritization of PECH Actions - Input into 2025 budget recommendations - Develop and update yearly action plans			Whole of Community System Leadership Model in place and guiding PECH Implementation
Continuation of the SDC Lived Experts Prototyping Process broadening representation of LE voices from across the Region.			Lived Expertise Advisory Board(s) and Process(es)
Fee-For-Service and 2024 PECH Budget Initiatives Begin Implementation		2025 Budget report to Council for FFS and PECH priorities	2025 Budget implementation
System Leadership Capacity Building (Topics may include Adaptive Leadership, Community Co-Creation, Human Centred Design)			
	Return to Regional Council with updated 2025-2030 Investment and Advocacy Strategy		
On-going Communication, Engagement and Change Management - Education on PECH vision, initiatives and coming changes to system agencies and partners - Communication strategy to educate broader community including establishing a central website / dashboard - Leverage Central communication resources to illuminate stories of success and change - Implement a change management process across Whole of Community Leadership partners.			

- Continue change management through identifying, connecting and nurturing champions within the system

The Final Plan to End Chronic Homelessness Report is the culmination of deep, collective community-based work to respond to a growing crisis. The Final Report does not end the collective work of preventing, addressing, and ending chronic homelessness in Waterloo Region. Rather, this is the beginning of a renewed collective focus to create Homes for All for our community's most vulnerable residents. Staff, Co-Creators, and the community more generally are committed to the work ahead and are deeply encouraged and motivated to begin the work of implementing the Plan.

“A community means we're all in this together. We shouldn't 'other' people in need or blame them. Any of us could see a reversal of fortune and some of us have never had the benefit of a network.”—Engagement Participant

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Waterloo Region
April 2024

The Plan
to End Chronic
Homelessness

**IN COMMUNITY,
BY COMMUNITY,
FOR COMMUNITY.**
#ThePlan

This is Exhibit "B" referred to in the Affidavit of Peter Sweeney affirmed by Peter Sweeney of the City of Cambridge, in the Regional Municipality of Waterloo, before me at the City of Toronto, in the Province of Ontario, on June 6, 2025 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits (or as may be)

GRETA HOAKEN

BY-LAW NUMBER 25-021
OF
THE REGIONAL MUNICIPALITY OF WATERLOO

A By-law Respecting the Use of 100 Victoria Street North, Kitchener (as Owned by The Regional Municipality of Waterloo) to facilitate the Kitchener Central Transit Hub and other Transit Development

WHEREAS The Regional Municipality of Waterloo (the "Region") owns the property municipally known as 100 Victoria Street North, in the City of Kitchener ("100 Victoria Street");

AND WHEREAS 100 Victoria Street is required for the construction of the Kitchener Central Transit Hub (the "KCTH") by the Region and Metrolinx commencing in 2026;

AND WHEREAS the Region requires vacant possession of 100 Victoria Street by December 1, 2025 to facilitate the construction of the KCTH;

AND WHEREAS the KCTH, once constructed, will bring significant economic opportunity to the Region, including providing more affordable transportation options and greater connectivity for all residents of the Region to access jobs, schools, and essential services both within and outside the Region;

AND WHEREAS the commencement of construction of the KCTH entails a significant investment in the Region;

AND WHEREAS there are currently persons, without permanent residences, who are occupying parts of 100 Victoria Street including through the erection of temporary shelters and the placement of personal property (the "Encampment");

AND WHEREAS the Region has enacted the Code of Use Bylaw, specifically By-law 13-050, as amended, respecting the conduct of persons entering upon certain buildings, grounds and public transportation vehicles owned or occupied by the Region;

AND WHEREAS the Region takes note of the decision of the Ontario Superior Court of Justice, in the decision of the *Region v. Persons Unknown and To Be Ascertained*, (the "Decision");

AND WHEREAS the Region wishes to specifically provide for the persons currently occupying the Encampment at 100 Victoria Street to ensure that a safer and more orderly environment is maintained;

AND WHEREAS the Region, since the Decision, has greatly expanded the number of available accessible shelter beds in the Region and has allocated additional resources to provide accommodation for all persons presently occupying the Encampment;

AND WHEREAS the Region is enacting this By-law to specifically regulate and govern 100 Victoria Street and to obtain vacant possession as of December 1, 2025;

AND WHEREAS the Region has the capacity, rights, powers and privileges of a natural person and the ability to govern its affairs as it considers appropriate pursuant to sections 8 and 9 of the *Municipal Act, 2001*, S.O. 2001, c. 25, as amended;

AND WHEREAS the Region has the authority to enact by-laws respecting its public assets and the protection of persons and property pursuant to subsection 11(2) of the *Municipal Act, 2001*, S.O. 2001, c. 25, as amended;

NOW THEREFORE THE COUNCIL OF THE REGIONAL MUNICIPALITY OF WATERLOO ENACTS AS FOLLOWS:

PART I - DEFINITIONS

1. In this By-law:
 - (1) **“Designated Personnel”** means those persons listed in Schedule “A” of this By-law;
 - (2) **“Municipal Act, 2001”** means the *Municipal Act, 2001*, S.O. 2001, c. 25, as amended, or any successor legislation;
 - (3) **“100 Victoria Street”** means the property municipally known as 100 Victoria Street North, in the City of Kitchener;
 - (4) **“Prohibited Activity”** means any activity that is listed in Schedule “B” of this By-law;
 - (5) **“Region”** means The Regional Municipality of Waterloo; and
 - (6) **“Trespass to Property Act”** means the *Trespass to Property Act*, R.S.O. 1990, c. T.21, as amended, or any successor legislation.
 - (7) **“Resident”** means anyone residing at 100 Victoria Street as of the date that notice of this bylaw is provided through the posting of the agenda for the Council meeting at which this By-law will be considered on the Region's website (“Public Notice Date”).

PART II – PROHIBITION

2. No person shall engage in a Prohibited Activity on 100 Victoria Street.
3.
 - (1) Commencing on December 1, 2025, no person shall enter onto, reside on, or occupy 100 Victoria Street or any part thereof.
 - (2) Subsection (1) of this section shall not apply to an employee or contractor of the Region or other person who has the authorization of the Region to enter onto or occupy 100 Victoria Street or any part thereof.
4. Every person who contravenes sections 2 or 3 of this By-law is guilty of an offence and on conviction is liable to a fine not exceeding \$5,000, exclusive of costs.

PART III - TRESPASS

5. Without limiting Part II of this By-law, Designated Personnel may exercise any of the following enforcement options at 100 Victoria Street when a person is contravening or has contravened sections 2 or 3 of this By-law:
 - (1) Issue a verbal direction to refrain from a Prohibited Activity or the contravention of section 3 of this By-law;
 - (2) Subject to section 6 of this By-law, issue a verbal direction to leave 100 Victoria Street, citing as the reason the failure to refrain from a Prohibited Activity or the contravention of section 3 of this By-law;
 - (3) Serve a written notice upon a person prohibiting a Prohibited Activity or the contravention of section 3 of this By-law, citing as the reason the failure of the person to refrain from a Prohibited Activity or the contravention of section 3 of this By-law;
 - (4) Subject to section 6 of this By-law, serve a written notice upon a person

prohibiting entry upon 100 Victoria Street citing as the reason the failure of the person to refrain from a Prohibited Activity or the contravention of section 3 of this By-law;

- (5) Post a sign so that the sign is clearly visible in daylight under normal conditions from the approach to each ordinary point of access to 100 Victoria Street prohibiting a Prohibited Activity or the contravention of section 3 of this By-law;
 - (6) Subject to section 6 of this By-law, post a sign so that the sign is clearly visible in daylight under normal conditions from the approach to each ordinary point of access to 100 Victoria Street prohibiting entry upon 100 Victoria Street by a person citing as the reason the failure to refrain from a Prohibited Activity or the contravention of section 3 of this By-law;
 - (8) Subject to section 6 of this By-law, erect fencing or other barriers prohibiting entry upon 100 Victoria Street or any part thereof by a person citing as the reason the failure to refrain from a Prohibited Activity or the contravention of section 3 of this By-law;
 - (9) Subject to section 6 of this By-law, remove any personal property or fixture upon 100 Victoria Street or any part thereof that is owned by a person citing as the reason the failure to refrain from a Prohibited Activity or the contravention of section 3 of this By-law; and
 - (10) Exercise any other rights or powers pursuant to the *Trespass to Property Act* that are reasonable in the circumstances.
6. From the date of passage of this By-law until November 30, 2025, no Resident will be removed involuntarily from or prohibited from entering their temporary shelter at 100 Victoria Street as a result of engaging in a Prohibited Activity, unless the Prohibited Activity creates or contributes to a serious risk to their own health or safety or the health or safety of another person. For greater certainty, nothing in this By-law permits a Resident to relocate their temporary shelter to another part of the premises at 100 Victoria Street without the permission of the Region.
 7. Designated Personnel may contact the Waterloo Regional Police Service, or any other police service having lawful jurisdiction, at any time to request assistance or to initiate any other action as the police service may deem necessary in the circumstances.
 8. For greater certainty, and without limiting the above, Designated Personnel may erect a fence or other barrier to prohibit entry to any unoccupied area of 100 Victoria Street.

PART IV - GENERAL

9. This By-law may be enforced by a Designated Personnel or a police officer.
10. This By-law may be cited as the "100 Victoria Street Code of Use By-law".
11. If any section or sections of this By-law or parts thereof are found by any Court to be illegal or beyond the power of Council of the Region to enact, such section or sections or parts thereof shall be deemed to be severable and all other sections or parts of this By-law shall be deemed to be separate and independent therefrom and shall continue in full force and effect unless and until similarly found illegal.

12. This By-law shall come into force and take effect on the date of final passage hereof.

By-law read a first, second and third time and finally passed in the Council Chamber in the Regional Municipality of Waterloo this 23rd day of April, A.D., 2025.

Decoded by:
Will Short

REGIONAL CLERK

Decoded by:
Karen Redman

REGIONAL CHAIR

SCHEDULE "A"

DESIGNATED PERSONNEL

1. The following are Designated Personnel:
 - (1) Supervisor, Security Services, for the Region, or any successor position thereto;
 - (2) a municipal law enforcement officer as appointed by the Region;
 - (3) a security guard under contract to the Region; and
 - (4) other persons from time to time as may be designated by Council of the Region.

SCHEDULE "B"

PROHIBITED ACTIVITIES

1. The following activities are Prohibited Activities:
 - (a) carrying any goods, without authorization, which are offensive, dangerous, toxic, corrosive, flammable or explosive in nature that are likely to alarm, inconvenience, cause discomfort or injure any person, or cause damage to property, whether or not such good are contained in an approved container;
 - (b) acts which are reasonably perceived as threatening, intimidating or sexual harassment;
 - (c) any activity contrary to the *Criminal Code of Canada*, R.S. 1985, c. C-46, as amended, other federal statutes, provincial statutes or municipal by-laws;
 - (d) erecting a shelter or other structure (provided, however, that this shall not apply to shelters or other structures that were in place on the Public Notice Date);
 - (e) residing on 100 Victoria unless the person is a Resident within the meaning of this bylaw.
 - (f) acts which interfere with the provision of services to residents of 100 Victoria Street; or acts which interfere with the use of 100 Victoria Street for the purposes of work relating to or in any way connected with KCTH; and
 - (g) acts which are contrary to any specific rules or terms of use for the Designated Premises provided that the specific rules or terms of use have been posted in a conspicuous location at the Designated Premises.

This is Exhibit "C" referred to in the Affidavit of Peter Sweeney affirmed by Peter Sweeney of the City of Cambridge, in the Regional Municipality of Waterloo, before me at the City of Toronto, in the Province of Ontario, on June 6, 2025 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

A handwritten signature in black ink, appearing to read 'Greta Hoaken', written over a horizontal line.

Commissioner for Taking Affidavits (or as may be)

GRETA HOAKEN

Region of Waterloo

Planning, Development, and Legislative Services

Legal Services

To: Regional Council

Meeting Date: April 23, 2025

Report Title: 100 Victoria Street, North, Kitchener – Site Specific By-law

1. Recommendation

That the Regional Municipality of Waterloo pass a by-law in the form attached as Appendix ‘A’ to this Report PDL-LEG-25-017, being a Site Specific By-law respecting the use of 100 Victoria Street, North, Kitchener (as Owned by The Regional Municipality of Waterloo) to facilitate the Kitchener Central Transit Hub (KCTH) and other transit-related development.

That the Regional Municipality of Waterloo direct staff to implement a plan for alternative accommodation for current residents of 100 Victoria Street North, Kitchener, and add \$814,333 to the 2025 regional Housing budget as outlined in this Report PDL-LEG-25-017.

2. Purpose / Issue:

The Kitchener Central Transit Hub (“KCTH”) is a transformational project that has been in the planning stages since 2013. To advance construction, Metrolinx has advised that it requires the use of the Region’s property at 100 Victoria Street North by March 2026. The process to prepare the site for use by Metrolinx will take several months, requiring the site to be vacant by December 1, 2025.

There currently is an encampment of residents located at 100 Victoria Street North (the “Encampment”). A bylaw is therefore being introduced to Regional Council to allow the Region to obtain vacant possession of 100 Victoria Street North.

The purpose of this report is to seek Regional Council approval of a Site Specific By-law for 100 Victoria Street North, to facilitate remediation of the property commencing December 1, 2025 and Metrolinx’s use of the property by March 2026.

3. Strategic Plan:

The Region of Waterloo is on a journey of growth to an intentional, sustainable future of one million residents. KCTH supports the Homes for All, Equitable Services and Opportunities and Climate Aligned Growth focus areas within the Region’s 2023 – 2027

Strategic Plan.

Upon completion, KCTH will enhance and integrate transit infrastructure, provide residential and commercial development opportunities and be a gateway for economic development for Waterloo Region.

4. Report Highlights:

- KCTH has been in the planning stages since 2013 and builds on the success of ION light rail. Designed to serve current and future residents, as well as visitors, the transit hub will redefine how people connect, commute, and experience Waterloo Region.
- Work on KCTH has advanced to the stage where construction is anticipated to begin in the next year. To further advance the project, the Region's property at 100 Victoria Street North is required by Metrolinx in March 2026.
- The Region is required to complete due diligence and site preparation at 100 Victoria Street North prior to handover of the property to Metrolinx. This work will take approximately three months to complete and cannot be undertaken with an encampment present on the property.
- To meet this timeline, a bylaw is now being introduced that requires the site to be vacant by December 1, 2025.
- In preparation for this transition, Regional staff will provide enhanced support by focusing efforts and resources on current residents for available housing and shelter options.
- In the context of the decision of Justice Valente in *The Regional Municipality of Waterloo v. Persons Unknown and to be Ascertained*, 2023 ONSC 670 ("Valente Decision") the Region intends to seek further direction from the Superior Court of Justice, to the extent this is feasible and compatible with the anticipated construction schedule.

5. Background:

KCTH Development

As the Region quickly grows to one million residents, the community is on the cusp of significant change. To help shape future growth, the Region, along with many partners, is leading transformational projects that will positively impact residents and visitors for generations to come.

Designed to serve current and future residents, as well as visitors from around the world, KCTH will redefine how people connect, commute, and experience our community. Building on the community investment in ION light rail, KCTH will connect ION light rail, GRT, GO Transit (rail and bus service), VIA, rail service, intercity bus,

active transportation, passenger vehicles, cyclists and pedestrians in one central location.

The transit hub is expected to generate ION ridership as an anchor development along the Central Transit Corridor with transit station functions integrated with a future mixed-use destination. It will be a gateway to the Region of Waterloo and will connect residents and visitors to the Toronto-Waterloo Region innovation corridor.

KCTH is a landmark development and has the potential to stimulate growth, development and sustainability well into the future.

As part of this project, the Region has procured land on Victoria Street, from King Street to Weber Street. Upon completion of the transit hub, the remaining land will be used for commercial and residential development, including affordable housing.

In 2016, the Province recognized the value of investing in the Region of Waterloo's transit infrastructure, providing \$43 million to support the transit hub. In February 2023, the Region applied for funding through the Public Transit stream of the Investing in Canada Infrastructure Program (ICIP). A decision on the application is pending.

The timing of the Region's work for the KCTH is driven by Metrolinx's construction schedule for its railway track and platform improvements adjacent to the KCTH site. Since Region staff provided the Kitchener Central Update in December, 2024 (see Appendix B) Metrolinx has notified the Region that it requires the Region owned property at 100 Victoria Street North for its use by March, 2026.

As a part of the KCTH development, Metrolinx will raise the section of rail tracks between King Street and Weber Street and relocate the rail platform from between Weber Street and Ahrens Street to the rail corridor between King Street to Duke Street. Metrolinx will also construct a diversion track that will be incorporated in the rail system immediately behind 100 Victoria Street North. Construction of the diversion track will include the build-up of ground level and rail modifications in this area.

The Region will be obligated to provide 100 Victoria Street North to Metrolinx in a condition fit for Metrolinx's use. To do so, remediation work must be completed before vacant possession of the land is delivered to Metrolinx. This includes site clean up, site investigations and geotechnical testing. It is anticipated this work will take three months, allowing for contingencies for unfavourable weather.

The Region will commence its construction activity for the KCTH project in 2025 with the demolition of the section of the Rumpel Felt building that does not have a heritage designation.

In 2026, the Victoria Street North Modifications, between Weber Street West to King

Street West, will begin. From 2027 to 2030, a bus loop, pedestrian bridge, pedestrian ramp and the hub facility will be built.

Site Specific By-law Respecting Use of 100 Victoria Street, North, Kitchener

This proposed Bylaw is a Site- Specific By-law respecting the use of 100 Victoria Street, North, Kitchener, which is owned by The Region.

The intent of the By-law is to facilitate the development of the KCTH and other transit development. To do so, it provides for vacant possession of 100 Victoria Street North by December 1, 2025.

This will allow the requisite time for the Region to complete site preparation activities prior to the handover to Metrolinx, and for Region staff to engage with encampment residents and assist in relocating these individuals.

The By-law specifically regulates 100 Victoria Street North. The By-law provides for persons currently residing at 100 Victoria Street North and their need to transition to alternate accommodation prior to December 1, 2025. To enable vacant possession by December 2025, the By-law provides that no persons who were not residents on the date public notice of the By-law was provided may erect shelters or other structures or reside at 100 Victoria Street North.

To support current residents of the Encampment (i.e. those who were present on the property when public notice of the By-law was provided), Region staff will provide enhanced site support by focussing efforts and resources on current residents for available housing and shelter options and transition to alternate accommodation.

Transition of Current Encampment Residents

Region staff have developed a proposed plan to transition encampment residents from 100 Victoria Street North. This transition will be supported through additional new resources, which may be summarized as follows:

- That Regional staff provide enhanced site support by focussing efforts and resources on current residents for available housing and shelter options and ongoing site management
- That this work be accomplished with an approach consistent with the Plan to End Chronic Homelessness
- This operational effort would be coordinated by a cross departmental structure and will wind down before November 30th.

Region staff have been supporting residents at the Encampment since December 2021. This includes regular supports provided by outreach staff, connections with Ontario

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Works Caseworkers, providing regular cleaning and maintenance of the site, hiring pest control, portable washrooms, lighting, and other health and safety interventions.

Site security has been provided 24/7 since the spring of 2022. These efforts will continue through the transition process.

6. Communication and Engagement with Area Municipalities and the Public

Area Municipalities:

Over the last number of years, Region staff have worked with various municipal staff in area municipalities, particularly at the City of Kitchener and with community partners, to advance KCTH and manage the 100 Victoria site.

Should this By-law be approved, Region staff would continue to work with area municipalities and interest holders in its implementation.

Public:

Individuals currently residing at 100 Victoria Street North are being informed about the proposed By-law by the Region staff who visit the site daily to provide supports.

Partners and key stakeholders are being notified about the proposed By-law.

Updates to the community on KCTH have been ongoing and regular updates will continue throughout construction. More information can be found at:

<https://www.engagewr.ca/king-victoria-transit-hub>

7. Financial Implications:

Current costs to maintain the site at 100 Victoria are \$793,944 annually (\$66,162/month). These include costs for security, pest control, portable toilets, garbage removal, and ongoing servicing and maintenance. These do not include staffing costs for social supports, outreach, facilities, or by-law staff who attend the site regularly.

Site Support Budget April-November 2025

Item	2025 Amount
Supportive Housing Units (new)	\$271,250
Scattered Site Rent Supplements with social supports (existing)	\$183,750
Motels with social supports (new)	\$466,083
Site Remediation (new)	\$77,000
Total Investment	\$998,083
Less: Internal Reallocation	\$183,750

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Total New net costs for 2025	\$814,333

Annualized Site Support Net Financial Impact for 2026 & 2027

	2026	2027
Annualized Supportive Housing	\$ 465,000	\$ 465,000
Annualized Motels*	\$ 799,000	\$ 0
Site Remediation	\$ 35,000	\$ 0
Less: savings from closing 100V currently budgeted for security and maintenance	(\$ 793,944)	(\$ 793,944)
Total Net Impact	\$ 505,056	(\$ 328,944)

**Motels will only be used for temporary support and will not extend beyond 2026*

8. Conclusion / Next Steps:

Approval by Council of the proposed Site Specific By-law respecting the use of 100 Victoria Street North, Kitchener, and the plan for alternative accommodation for current residents of 100 Victoria Street, North, to facilitate the transition of current residents to alternative accommodation so that vacant possession of the site is achieved by December 1, 2025. Site preparation can then be completed so that the lands are ready for Metrolinx use in March, 2026.

9. Attachments:

Appendix A: Site Specific By-law respecting the use of 100 Victoria Street, North, Kitchener (as Owned by The Regional Municipality of Waterloo) to facilitate the Kitchener Central Transit Hub and other Transit Development.

Appendix B: Report EES-SAM-24-002

Appendix C: Moving forward on Kitchener Central Transit Hub: Site Specific By-law Presentation

Prepared By: Katie Johnson, Director, Strategic Initiatives and Asset Management, Engineering and Environmental Services

Fiona McCrea, Acting Regional Solicitor/Director Legal Services

Ryan Pettipiere, Director, Housing Services

Reviewed By: Peter Sweeney, Commissioner, Community Services

Approved By: Jennifer Rose, Commissioner, Engineering and Environmental Services

Doug Spooner, Acting Commissioner, Transportation Services

Rod Regier, Commissioner, Planning Development and Legislative
Services

BY-LAW NUMBER 25-***

OF

THE REGIONAL MUNICIPALITY OF WATERLOO

A By-law Respecting the Use of 100 Victoria Street North, Kitchener (as Owned by The Regional Municipality of Waterloo) to facilitate the Kitchener Central Transit Hub and other Transit Development

WHEREAS The Regional Municipality of Waterloo (the “Region”) owns the property municipally known as 100 Victoria Street North, in the City of Kitchener (“100 Victoria Street”);

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AND WHEREAS the Region takes note of the decision of the Ontario Superior Court of Justice, in the decision of the *Region v. Persons Unknown and To Be Ascertained*, (the “Decision”);

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AND WHEREAS the Region, since the Decision, has greatly expanded the number of available accessible shelter beds in the Region and has allocated additional resources to provide accommodation for all persons presently occupying the Encampment;

AND WHEREAS the Region is enacting this By-law to specifically regulate and govern 100 Victoria Street and to obtain vacant possession as of December 1, 2025;

AND WHEREAS the Region has the capacity, rights, powers and privileges of a natural person and the ability to govern its affairs as it considers appropriate pursuant to sections 8 and 9 of the *Municipal Act, 2001*, S.O. 2001, c. 25, as amended;

AND WHEREAS the Region has the authority to enact by-laws respecting its public assets and the protection of persons and property pursuant to subsection 11(2) of the *Municipal Act, 2001*, S.O. 2001, c. 25, as amended;

NOW THEREFORE THE COUNCIL OF THE REGIONAL MUNICIPALITY OF WATERLOO ENACTS AS FOLLOWS:

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 - (7) “**Resident**” means anyone residing at 100 Victoria Street as of the date that notice of this bylaw is provided through the posting of the agenda for the Council meeting at which this By-law will be considered on the Region’s website (“Public Notice Date”) .

PART II – PROHIBITION

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3. (1) Commencing on December 1, 2025, no person shall enter onto, reside on, or occupy 100 Victoria Street or any part thereof.
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REGIONAL CLERK

REGIONAL CHAIR

SCHEDULE “A”

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SCHEDULE "B"

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 - (f) acts which interfere with the provision of services to residents of 100 Victoria Street; or acts which interfere with the use of 100 Victoria Street for the purposes of work relating to or in any way connected with KCTH; and
 - (g) acts which are contrary to any specific rules or terms of use for the Designated Premises provided that the specific rules or terms of use have been posted in a conspicuous location at the Designated Premises.

Region of Waterloo

Engineering and Environmental Services

Strategic Initiatives and Asset Management

To: Sustainability, Infrastructure, and Development Committee

Meeting Date: December 3, 2024

Report Title: Kitchener Central Update

1. Recommendation

For information.

2. Purpose / Issue:

The purpose of this report is to provide an update on the progress of the Kitchener Central Transit Hub (KCTH). As progress on this landmark project advances, it is timely to highlight project updates and upcoming project milestones.

3. Strategic Plan:

The Region of Waterloo is on a journey of growth to an intentional, sustainable future of one million residents. The Kitchener Central Transit Hub supports the Homes for All, Equitable Services and Opportunities and Climate Aligned Growth focus areas within the Region's 2023 – 2027 Strategic Plan.

Upon completion, the KCTH will enhance and integrate transit infrastructure, provide residential and commercial development opportunities and be a gateway for economic development for the Region and area municipalities.

4. Report Highlights:

- The Kitchener Central Transit Hub will be a focal point for higher-order transit, providing access to ION light rail, GO Transit (rail and bus service), VIA rail service, intercity bus, and GRT, passenger vehicles and active transportation.
- KCTH has been renamed from the King Victoria Transit Hub to align with Grand River Transit's ION Kitchener Central Station and GO Transit's Kitchener Station.
- The Region owns land on Victoria Street, from King Street to Weber Street. Upon completion of the transit hub and its related transit infrastructure, the remaining land will be developed. Development opportunities include commercial, and residential (including affordable housing).

December 3, 2024Report: EES-SAM-24-002

- Work on KCTH has advanced to the stage where construction is anticipated to begin in 2025. This will include Region-led projects: the demolition of the Rumpel Felt building (the part without a historic designation), the installation of a bus loop, a pedestrian bridge, a pedestrian ramp and a parking lot.
- The Victoria Street North Modifications project will be added to the Transportation Capital Program and will create multi-modal links to KCTH.
- The Ministry of Transportation and the Region have agreed on an amendment to the existing Transfer Payment Agreement. The amendment extends the expiry date of the TPA. Staff on both sides are discussing appropriate measures to address TPA funding shortfalls.
- An application for funding through the Public Transit stream of the Investing in Canada Infrastructure Program (ICIP) was submitted in February 2023. The Region of Waterloo is awaiting a decision on the application.

5. Background:

As the Region quickly grows to one million residents, the community is on the cusp of significant change. To help shape future growth, the Region, along with many partners, is leading transformational projects that will impact the Region and area municipalities for generations to come. Similarly to the success that was experienced with ION light rail, KCTH has the potential to positively impact growth, development and sustainability well into the future.

In 2016, the Province recognized the value of investing in the Region of Waterloo's transit infrastructure, providing \$43 million to support the transit hub.

KCTH will be a gateway to the Region of Waterloo through a landmark development and will connect residents and visitors to the Toronto-Waterloo Region innovation corridor through the co-location of ION light rail, GO Transit (rail and bus service), VIA rail service, intercity bus, active transportation, passenger vehicles and GRT.

The transit hub is expected to generate ION ridership as an anchor development along the Central Transit Corridor with transit station functions integrated with a future mixed-use destination.

Scope of Work

The scope of work for the Kitchener Central Transit Hub includes:

- the design and development of a transportation hub building,
- a pedestrian bridge over King Street,
- a bus loop for GRT and GO transit,

December 3, 2024Report: EES-SAM-24-002

- a pedestrian ramp,
- a parking lot,
- stormwater management and
- site development.

Following completion of the work, the Region will seek to partner with a private developer to create a mixed-use site incorporating unused land into the vision for the transit hub.

Project Updates

The timing of the Region's work is driven by Metrolinx's construction schedule. Due to the complex nature of the project and adjacent construction sites close to one another, the sequencing of work will be critical to successful delivery. The Region will work collaboratively with Metrolinx to confirm the schedule following the award of the Metrolinx contract.

The Region expects further updates to the construction schedule as construction staging plans are finalized with the onboarding of contractors but anticipates construction work to begin in 2025 with completion by the end of 2029.

The Region and Metrolinx meet bi-weekly to review coordination items between parallel designs. Success during construction will be highly reflective of both parties' efforts to coordinate components between the designs. The Region is working with Metrolinx to finalize a Memorandum of Understanding (MOU) agreement. An executable copy of this agreement is currently being prepared by Metrolinx. Several additional agreements are being developed in alignment with the MOU that include a Grade Separation Agreement, lease agreements and a fee simple land transfer agreement.

- The Ministry of Transportation and the Region have agreed on an amendment to the existing Transfer Payment Agreement with the intent of having it actioned before the end of the calendar year. This amendment extends the expiry date of the TPA to December 31, 2030.

Region Progress

- The Region is concentrating their efforts on completion of the design by end of 2024 with the intent of procuring a Construction Manager in 2025.
- Alterations to the location of the pick-up and drop-off, the addition of more bus bays in the bus loop and detailed investigation into the stormwater flows for the site need to be finalized prior to continuing with the design of the transit building.

Corresponding Projects

There are a few key projects in the vicinity and in support of the transit hub that are noteworthy.

December 3, 2024Report: EES-SAM-24-002Acquisition of 70-84 Victoria Street North

The acquisition of 70-84 Victoria Street North (in March 2024) plays a pivotal role in the Kitchener Central Transit Hub lands project by expanding the site's footprint to enable comprehensive planning and development. This property is currently occupied with commercial tenants. The leases with tenants will be honoured and once complete, this additional land enhances the project by providing opportunities for improved connectivity between future transit services and urban infrastructure, while also creating space for complementary uses such as mixed-use development and public amenities. Ultimately, this acquisition strengthens the vision of the hub as a regional anchor for sustainable, transit-oriented growth.

Victoria Street Modifications (King Street West to Weber Street West)

This project includes modifications to Victoria Street to provide multimodal links to KCTH. A preferred preliminary design has been identified that involves the reduction from four vehicle lanes to two vehicle lanes to allow for transit priority lanes and active transportation infrastructure.

Site Development

Site development for the Kitchener Central Transit Hub lands is advancing steadily, with foundational planning and design milestones achieved. Key progress includes ongoing site preparation, and ongoing collaboration with stakeholders to finalize updated rail infrastructure. This will further inform the mixed-use development potential of the lands, and the integration of multimodal transit solutions into the design framework. At the project's core, the land visioning efforts ensure that site development aligns with the four regional strategic priorities, laying the foundation for transformative growth in the surrounding area.

Budgetary and Agreement Updates

Region and Metrolinx staff are negotiating a cost sharing agreement amendment for the additional works to be completed by Metrolinx within the rail corridor. This work includes:

- The multi-use trail underpass at Duke Street;
- The retaining wall on the south side of the rail corridor between Region and Metrolinx lands; Space for bike storage rooms, bus shelters and service rooms under the South Platform (equipment installation and fit-out of the space is not included); and
- Structural work for the station tunnel near King Street to provide direct access to the transit hub building from the North platform (equipment installation and fit-out of the tunnel is not included).

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\$10 million has been allocated within the MTO Transfer Payment Agreement (TPA) for the Region in-corridor work. The TPA has been amended to transfer these funds directly from MTO to Metrolinx for the completion of the work. Ownership of this infrastructure will follow a Grade Separation Agreement. The MOU agreement provides for future licence, operations and maintenance agreements for the Region's long-term use of this infrastructure. The MOU agreement also includes provisions for dispute resolutions, access, insurance requirements and clearly identified role and responsibilities of both parties in relation to the cost shared scope as well as the overall project.

The current TPA is no longer sufficient to cover the estimate of the pedestrian bridge over King Street, the bus loop, the pedestrian ramp and the parking lot. The TPA was originally developed in 2018 and since then the project has seen significant alterations in scope, unprecedented inflation rates and modifications in funding structure. The funding challenges that have been identified, stem from a change in the delivery model, inflation and scope alternations since the commencement of the TPA. The Region is delivering all "off-corridor" works required to meet Metrolinx's Station Access Requirements. This includes a pedestrian bridge over King Street, fit out of the Bus and Bike parking facilities, a bus loop, pick up/drop off area, parking and additional site works. Region staff are working with the Ministry of Transportation to discuss appropriate measures to address this funding shortfall that is currently around \$9 million.

6. Communication and Engagement with Area Municipalities and the Public

Area Municipalities: City of Kitchener staff have been consulted on design components of the multi-use trail, ownerships of Duke Street and associated utilities. In 2023, the Region completed a pre-submission for Site Plan Approval whereby the Region received City comments regarding transit, civil and environmental design components. The Region will look to submit a final site plan approval package for further comment from the City of Kitchener. Region staff will continue to engage and involve City of Kitchener staff on an ongoing basis as progress continues.

Public: In June 2024, projects updates were made to the EngageWR page. During the same timeframe, the Project Manager presented aspects of the Region's works to the Grand River Accessibility Advisory Committee (GRAAC). Committee members were given an opportunity to provide feedback on accessibility components. The Region's design team are evaluating recommendations brought forward to understand how they might integrate into the proposed workplan.

7. Financial Implications:

The 2024-2033 Facilities and Fleet Capital Program includes a budget of \$347,000 in 2024 with an overall contribution of \$35 million from 2024 – 2029 for the Kitchener

December 3, 2024

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Central Transit Hub Project. This amount is to be funded from a TPA Agreement with the Province (MTO) in the amount of \$33 million and RDC debenture. Of the \$33 million, \$4.7 million has been consumed to date.

8. Conclusion / Next Steps:

Staff will continue to work with the MTO to ensure the Region has an amended TPA before the end of the calendar year. Coordination efforts with Metrolinx are ongoing to align both party's project plans. At the end of 2024, the Region anticipates having a complete design package.

Staff will continue to work with Metrolinx to finalize agreements to facilitate the work being carried out.

9. Attachments:

Appendix A: Rendering of Kitchener Central

Appendix B: Kitchener Central Transit Hub Presentation to SID Committee
December 3, 2024.pptx

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Doug Spooner, Acting Commissioner, Transportation Services

Chris Wood, Acting Commissioner, Planning, Development and
Legislative Services

Appendix A, EES-SAM-24-002: Rendering of Kitchener Central



Moving forward on Kitchener Central Transit Hub: Site Specific By-law

April 23, 2025



Kitchener Central Transit Hub

- Key infrastructure for our growing community
- Building on our world-class transit system
- Connecting ION, GRT, GO, VIA, carshare, Neuron, and active transportation in one central, convenient location



New phase of construction

- The Kitchener Central Transit Hub project is entering a new phase.
- Preliminary road work and demolition of the portion of the Rumpel Felt building that does not have heritage designation will start in 2025.
- Metrolinx requires the property at 100 Victoria Street, North by March 2026.
- Site preparation is required before this and is anticipated to take several months.
- A vacant site is required by December 1, 2025.

Enhanced site support

- Focused efforts and resources on current residents for available housing and shelter options
- Ongoing site management
- An approach that is consistent with the Plan to End Chronic Homelessness

Site Specific By-law Recommendation

- That the Regional Municipality of Waterloo pass a by-law in the form attached as Appendix 'A' to this Report, being a Site Specific By-law respecting the use of 100 Victoria Street, North, Kitchener (as Owned by The Regional Municipality of Waterloo) to facilitate the Kitchener Central Transit Hub (KCTH) and other transit-related development.
- That the Regional Municipality of Waterloo direct staff to implement a plan for alternative accommodation for current residents of 100 Victoria Street North, Kitchener, and add \$814,333 to the 2025 regional Housing budget as outlined in this Report.



This is Exhibit "D" referred to in the Affidavit of Peter Sweeney affirmed by Peter Sweeney of the City of Cambridge, in the Regional Municipality of Waterloo, before me at the City of Toronto, in the Province of Ontario, on June 6, 2025 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits (or as may be)

GRETA HOAKEN

2021 Point in time count findings



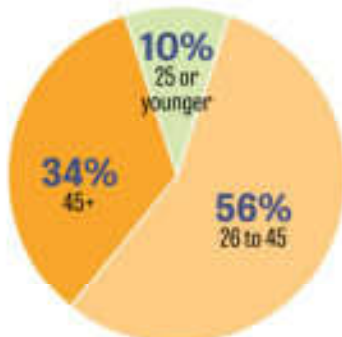
1085 people experiencing any type of homelessness were counted on **September 21, 2021.**

412 people living rough (living in encampments, on the street, or staying in their vehicle);
335 people experiencing hidden homelessness;
191 people in emergency shelter;
84 people in transitional housing;
63 people in institutions (Hospital, Police custody, Women's Crisis Services).

609 people included in the **point in time count** filled out a survey. A summary of their responses is outlined below.

WHO

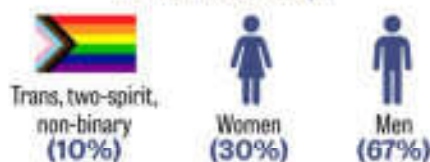
Age of survey respondents



Racial identity



Gender identity



WHERE/HOW LONG

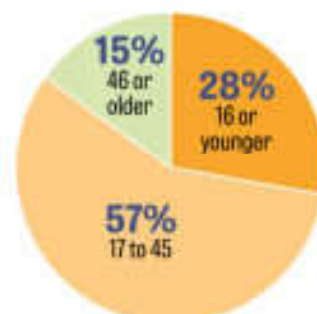
Where people are experiencing homelessness*



How long people have been experiencing homelessness in the last year



Age when people first experienced homelessness



* The number of people experiencing homelessness in these locations differs from the numbers reported at the top of the page as this section reports on where survey respondents are experiencing homelessness - not everyone experiencing homelessness filled out a survey.

EXPERIENCES OF HOMELESSNESS

Top five reasons people said caused their experience of homelessness

 Not enough income for housing **(33%)**

 Landlord / tenant conflict **(24%)**

 Substance use issues **(15%)**

 Conflict with spouse / partner **(14%)**

 Unfit / unsafe housing conditions **(13%)**



Health challenges reported by survey respondents

72%
Substance use

67%
Illness / medical condition

40%
Physical limitation

38%
Learning or cognitive limitation

Top ten services that would be helpful

 Finding affordable housing **(87%)**

 Housing search support (including support worker) **(69%)**

 Bus Pass **(68%)**

 Outreach workers **(59%)**

 Internet access **(56%)**

 Washrooms, showers **(54%)**

 Help writing housing applications **(50%)**

 Low barrier housing **(46%)**

 Personal Counselling **(45%)**

 Accessing income support programs (e.g. OW, EI) **(43%)**



Challenges to finding safe permanent housing

Low income **(78%)**

Rent too high **(73%)**

Discrimination **(34%)**

Poor housing conditions **(26%)**

Mental health issues **(25%)**

Criminal history **(24%)**

Family breakdown / conflict **(15%)**

Physical health issues, accessibility **(14%)**

To learn more about housing and homelessness services in Waterloo Region, please visit:

<https://www.regionofwaterloo.ca/en/living-here/housing-and-shelter.aspx>

This is Exhibit "E" referred to in the Affidavit of Peter Sweeney affirmed by Peter Sweeney of the City of Cambridge, in the Regional Municipality of Waterloo, before me at the City of Toronto, in the Province of Ontario, on June 6, 2025 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits (or as may be)

GRETA HOAKEN

2024 Point in time count findings



Region of Waterloo
COMMUNITY SERVICES

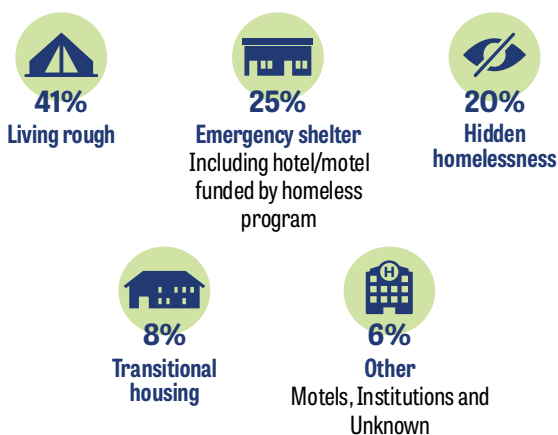
2371 people experiencing any type of homelessness were counted on **October 22, 2024.**

1009	people living rough (living in encampments, on the street, or staying in their vehicle)
446	people staying in an emergency shelter
353	people experiencing hidden homelessness (staying with friends or family, or temporary accommodations)
221	people staying in transitional housing
153	people staying in a motel funded by the Region
100	people in institutions (hospital, police custody)
89	people staying in unknown or undisclosed locations

1790 people included in the **point in time count** filled out a survey. A summary of the responses they shared is outlined below.

WHERE/HOW LONG

Where people are experiencing homelessness*



78% of people surveyed said they experienced chronic homelessness

Racial identity

26%

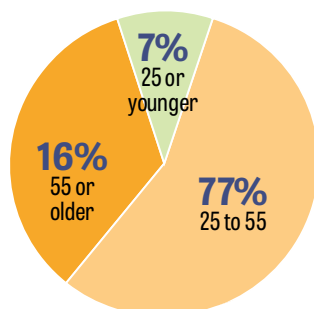
Identified themselves as members of a racialized community

17%

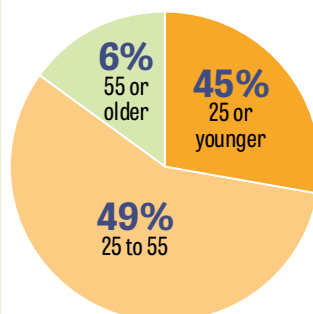
Identified themselves as First Nations, Inuit, or Métis

WHO

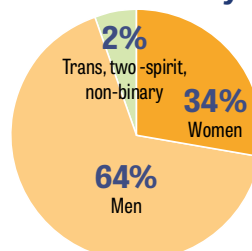
Age of survey respondents



Age when people first experienced homelessness



Gender identity



* The number of people experiencing homelessness in these locations differs from the numbers reported at the top of the page as this section reports on where survey respondents are experiencing homelessness - not everyone experiencing homelessness filled out a survey. Not everyone who participated in the survey answered every question. The percentages above are based on total responses for each question.

EXPERIENCES OF HOMELESSNESS

Top 5 reasons people said caused their experience of homelessness

Not enough income for housing **(44%)**

Conflict with spouse / partner **(18%)**

Landlord / tenant conflict **(13%)**

Unfit / unsafe housing conditions **(12%)**

Substance use issues **(11%)**



Health challenges reported by survey respondents

72%
Substance use

70%
Mental health

44%
Illness / medical condition

29%
Physical limitation

28%
Acquired brain injury

Top 10 services that would be helpful



Finding affordable housing
(76%)



Housing search support
(54%)



Bus pass
(53%)



Finding a job
(49%)



Accessing income support (e.g. OW, EI)
(45%)



Internet access
(42%)



Getting ID
(41%)



Outreach workers
(41%)



Secure storage
(39%)



Washrooms, showers
(39%)



Top 10 challenges to finding safe permanent housing

Low income **(80%)**

Rent too high **(78%)**

Addiction **(33%)**

No income assistance **(32%)**

Poor housing conditions **(31%)**

Mental health issues **(29%)**

Discrimination **(27%)**

Criminal history **(19%)**

Family breakdown / conflict **(18%)**

Physical health issues, accessibility **(16%)**

This is Exhibit "F" referred to in the Affidavit of Peter Sweeney affirmed by Peter Sweeney of the City of Cambridge, in the Regional Municipality of Waterloo, before me at the City of Toronto, in the Province of Ontario, on June 6, 2025 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits (or as may be)

GRETA HOAKEN

January 9, 2025

Municipalities Under Pressure:

THE HUMAN AND FINANCIAL
COST OF ONTARIO'S
HOMELESSNESS CRISIS





Ontario's Homelessness Crisis has Deepened Significantly

A WARNING SIGN THAT OUR
UNACCEPTABLE HOUSING PROBLEM IS
ON A TRAJECTORY TO GET WORSE

About this Report

The Association of Municipalities of Ontario (AMO), in partnership with the Ontario Municipal Social Services Association (OMSSA) and the Northern Ontario Service Deliverers Association (NOSDA), selected HelpSeeker through a Request for Proposal process as the successful proponent to quantify current and projected homelessness, identify and cost provincial-level solutions to achieve functional zero by 2030, and determine the investment gap between current and required funding across all government levels.

About HelpSeeker

HelpSeeker Technologies is a Canadian social innovation company dedicated to designing and implementing data-driven tools and services that empower communities, nonprofits, and government agencies. By delivering innovative solutions, we help organizations streamline operations, enhance decision-making, and address complex social challenges effectively.

Donaldson, J., Wang, D., Escamilla, C., & Turner, A. (2025). Municipalities under pressure: The human and financial cost of Ontario's homelessness crisis. HelpSeeker.

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Acknowledgements

This project represents a first-of-its-kind analysis made possible through the participation and contributions of the 47 service managers across Ontario, which provided essential data and insights to ground the analysis in local realities.

Special appreciation is extended to Michael Jacek (AMO) for his collaboration and leadership. Additional gratitude is extended to Fern Dominelli (NOSDA) and Doug Ball (OMSSA) for their significant expertise and their support in interpreting and contextualizing the data. The Steering Advisory Group, which included representatives from service managers, the Canadian Alliance to End Homelessness (CAEH), and Ontario Aboriginal Housing Services (OAHS), provided invaluable guidance to ensure the project reflects Ontario's diverse community needs and priorities.

Thank you to Kim Harper for her design contributions and Hedgehog Writing & Editing for copyediting, as well as to the HelpSeeker staff for their extensive efforts on this project.

Executive Summary

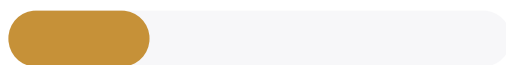
ONTARIO IS AT A TIPPING POINT IN ITS HOMELESSNESS CRISIS. NEW EVIDENCE REVEALS THE UNPRECEDENTED AND GROWING STRESS ON INDIVIDUALS, FAMILIES, COMMUNITIES, AND GOVERNMENTS.

For the first time, data from Ontario's 47 municipal service managers has been aggregated and analyzed, providing a fuller picture of the issue, along with a roadmap for the future.

In 2024, an estimated

81,515

ONTARIANS EXPERIENCED
KNOWN HOMELESSNESS



25% INCREASE
SINCE 2022



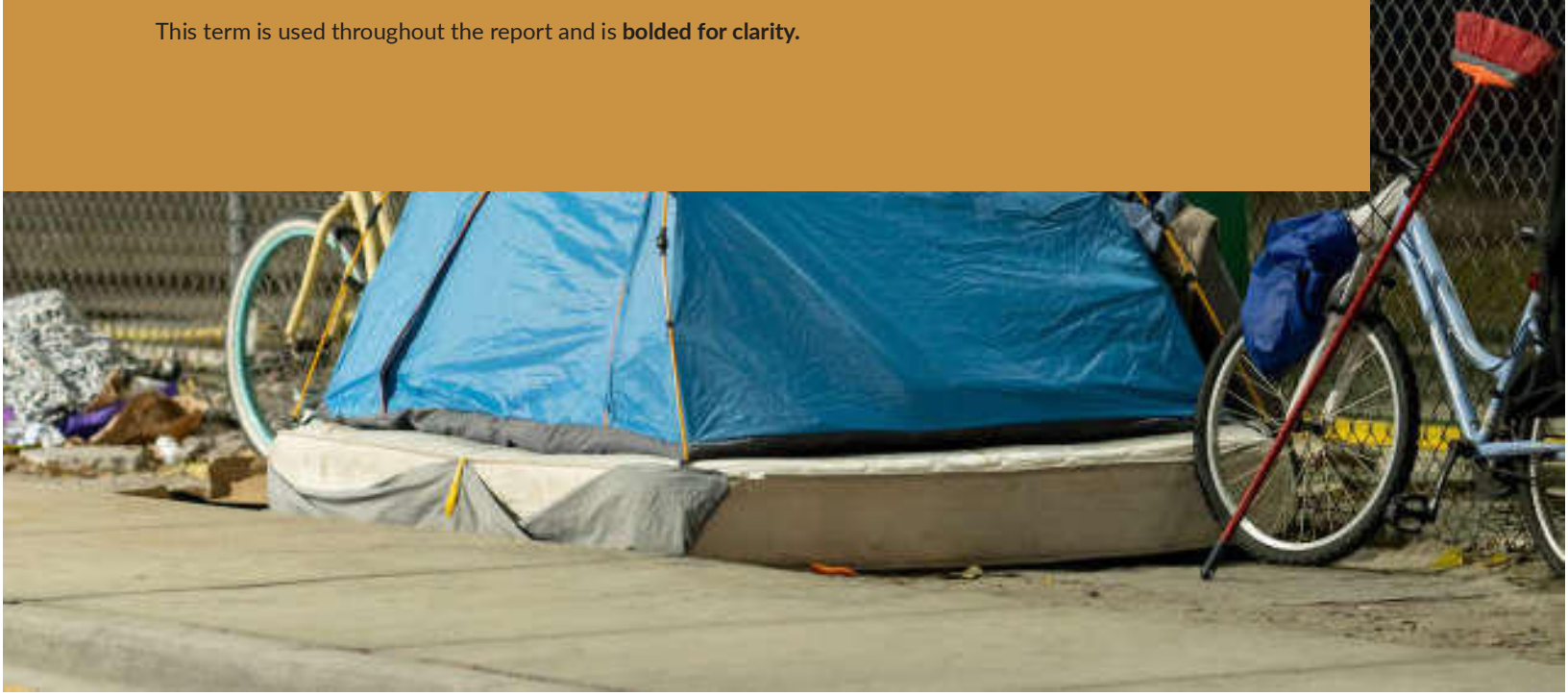
The incidence of chronic homelessness, characterized by prolonged or repeated episodes, has tripled over the same period, and now accounts for more than half of all cases of known homelessness.

THESE NUMBERS DEMONSTRATE SYSTEMIC FAILURES THAT EXTEND BEYOND HOUSING, REFLECTING DEEP GAPS IN HEALTHCARE, MENTAL-HEALTH SERVICES, JUSTICE SYSTEMS, AND MORE.

Known Homelessness

Known homelessness refers to people known to the homelessness-serving system, through service provision or data collection and prioritization activities, such as a By-Name List (BNL), Point-in-Time (PiT) count, or other tools. This primarily includes people experiencing sheltered or unsheltered homelessness—those staying in emergency shelters, hotels, or unsheltered locations like tents or outdoor spaces. Occasionally, a small proportion of individuals experiencing hidden homelessness may also be included, depending on how service managers reported their data.

This term is used throughout the report and is **bolded for clarity**.



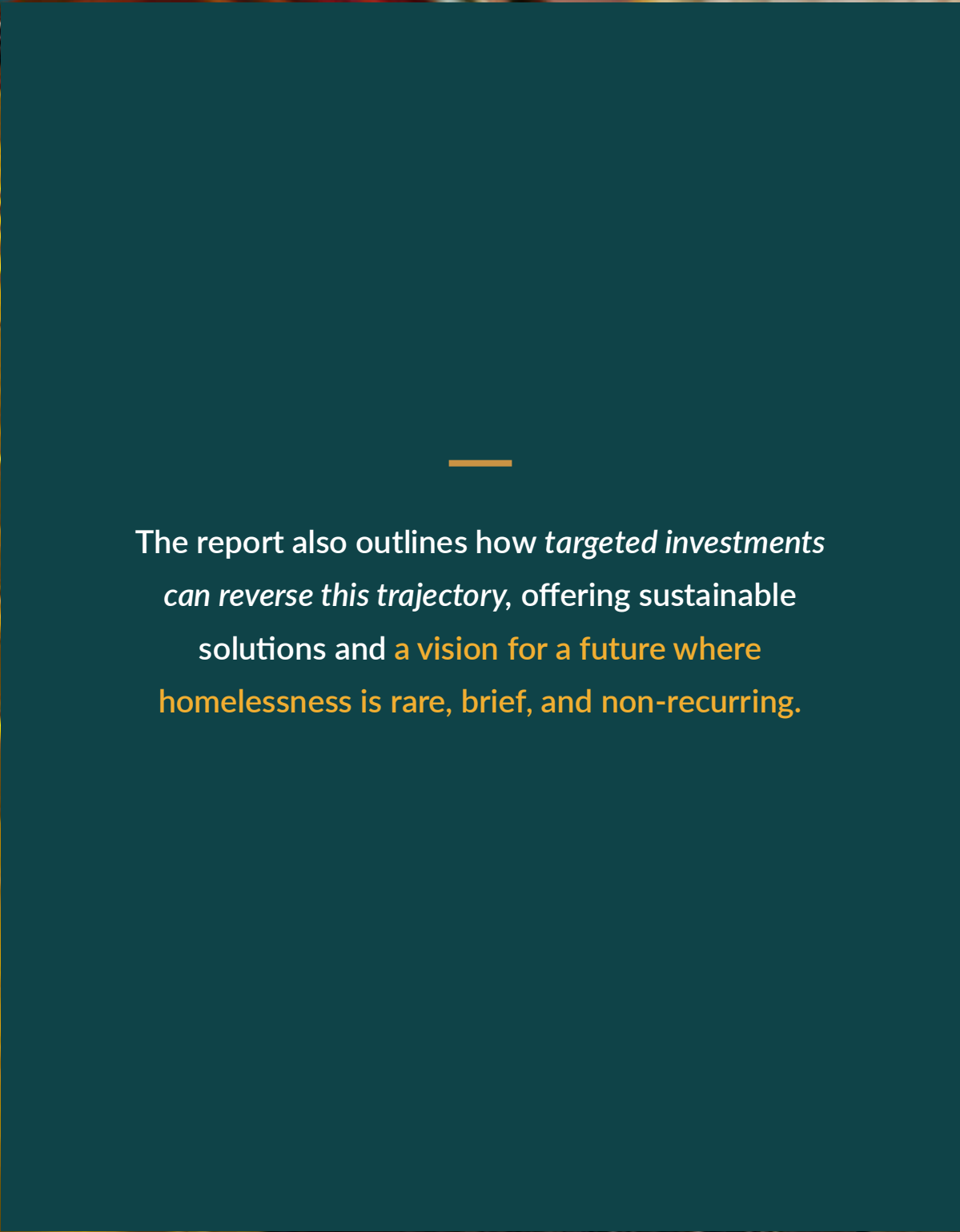
This report documents the problem and projects how homelessness in Ontario might look in the next decade.

Without significant intervention, homelessness could more than triple by 2035, leaving up to

294,266 people

without stable housing

under an economic downturn scenario—a reality that most would agree is unacceptable.



The report also outlines how *targeted investments can reverse this trajectory*, offering sustainable solutions and **a vision for a future where homelessness is rare, brief, and non-recurring.**

The Scale of the Crisis

Ontario's homelessness crisis has deepened significantly over the past decade, but the increasing proportion of **chronic homelessness—people in prolonged or repeated episodes of homelessness—is a warning sign** that our already unacceptable housing problem is on a trajectory to get worse.

In 2024, an estimated

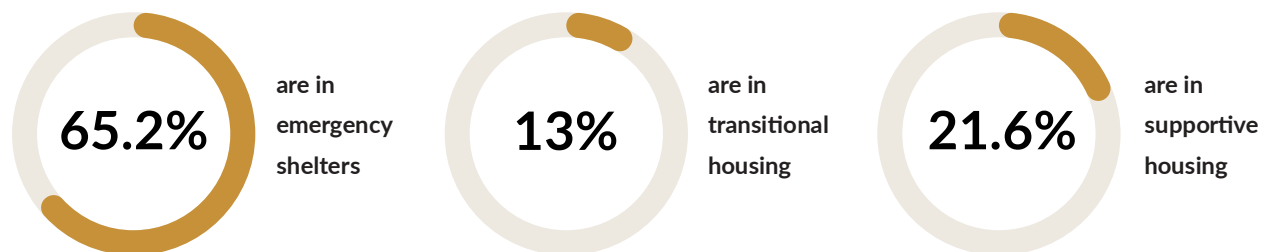
41,512 ONTARIANS EXPERIENCED
CHRONIC HOMELESSNESS,

accounting for more than half of all known cases of homelessness. This is a critical indicator of how strained the housing system is. Ideally, people should spend little to no time in the housing crisis system before transitioning to stable and appropriate housing. Chronic homelessness represents a breakdown in this process.

When chronic homelessness grows as a share of total homelessness, it reveals two fundamental systemic issues: **too many people are entering homelessness and too few people are exiting homelessness because of a lack of affordable, appropriate options.** In most cases, both problems apply. As a result, people become trapped in unsheltered homelessness or the emergency shelter system for extended periods, facing heightened risks of trauma, violence, worsening health outcomes, and even loss of life.

The reasons why too few people are exiting homelessness are clear: Ontario does not have enough housing spaces, and it does not have the right mix of spaces.

Of the 27,138 estimated spaces reported by service managers:



Emergency shelters are vital for individuals and families facing or experiencing crisis. But the growing proportion of chronic homelessness suggests that too many people remain in these temporary solutions longer than intended. Supportive housing—proven to help people transition out of homelessness permanently—is in critically short supply, with **only one non-health-operated supportive housing space available for every 14 people experiencing known homelessness.**

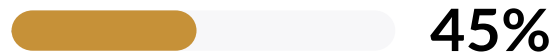
The overwhelming demand for affordable housing exacerbates the problem. Across Ontario, **more than 268,000 households are on housing waitlists**, with average wait times exceeding **five years** and, in some regions, surpassing **20 years**. This longstanding shortage of affordable housing creates immense pressure on homelessness-serving systems and forces people to rely on shelters or other temporary arrangements far longer than intended. Addressing these gaps—both in the overall availability of spaces and in ensuring the right service mix—is essential to breaking the cycles of homelessness, and creating a system where homelessness is **rare, brief, and non-recurring.**

The Unequal Effects of the Crisis

The scale of Ontario's homelessness crisis is compounded by the fact that its effects are not evenly felt. Certain populations face larger barriers and deeper inequities, leaving them disproportionately affected by the gaps in available resources.

INDIGENOUS PEOPLES

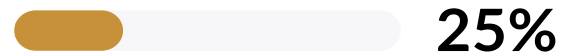
are disproportionately affected, representing nearly



of people experiencing chronic homelessness in northern communities. Systemic racism, discrimination, intergenerational trauma, and colonial policies have created barriers to culturally safe and Indigenous-led housing solutions. Further, a lack of adequate housing on reserve, stemming from insufficient funding, increases housing instability among Indigenous Peoples and contributes to vastly disproportionate rates of chronic homelessness.

CHILDREN AND YOUTH

now account for nearly



of those experiencing chronic homelessness, with **children aged 0–15 representing 12%** and **youth aged 16–24 accounting for 11%**.

These figures highlight the growing vulnerability of young people and the systemic gaps in services to support them.

REFUGEES AND ASYLUM SEEKERS

have experienced a sixfold increase in chronic homelessness since 2020, underscoring the challenges posed by immigration policies that fail to provide adequate support for housing and integration.

These systemic inequities are experienced at the individual level, and are deeply tied to where people live. **Ontario's homelessness crisis is shaped by regional disparities**, with northern, rural, and urban communities **facing unique challenges that exacerbate the strain on resources.**

In Northern Ontario, known homelessness has risen by an estimated 204% since 2016, growing from 1,771 people to 5,377 people in 2024.

By 2035, projections estimate that known homelessness in the north could climb to between

10,674 and 26,633 people,

depending on economic conditions. These figures highlight northern communities' acute vulnerabilities, which are driven by geographic isolation, limited infrastructure, and systemic inequities.

While Northern Ontario faces steeper proportional increases, non-northern regions in Ontario are grappling with an estimated 46% increase in known homelessness since 2016, rising from 52,032 to 76,140 people in 2024.

Homelessness in non-northern areas is projected to grow to between 117,448 and 267,633 people by 2035, depending on economic conditions. Urban centres bear the brunt of this increase, serving as service hubs for surrounding areas and key inflow points for people seeking support due to significant infrastructure gaps elsewhere in the province.

Urban centres are also seeing an increasing number of refugees and asylum seekers entering the homelessness response system, requiring urgent investment in specialized programs to aid transitioning into stable housing.

Rural communities also face challenges. Smaller communities often lack shelters, transitional housing, or specialized support, forcing individuals and families to either travel long distances to service hubs or remain in precarious situations.

Several key drivers contribute to regional and urban disparities:

SHELTER CAPACITY AND AFFORDABLE HOUSING SHORTAGES

are widespread, but especially pronounced in Northern Ontario and rural areas elsewhere in the province, where geographic isolation and higher costs limit expansion.

URBAN INFLOW PRESSURES,

driven by urban areas' dual role as service hubs and settlement locations for refugees and asylum seekers, increase the need for coordinated, community-specific solutions.

SPECIALIZED SUPPORTS

for mental health, substance use, and complex needs are scarce in smaller communities, creating significant barriers to housing stability.

TRANSPORTATION BARRIERS

and limited public services in Northern Ontario and rural areas make accessing shelters, healthcare, and supports particularly challenging, which worsens housing instability.

The growing pressures of Ontario's homelessness crisis are felt most acutely at the local level. Municipal governments are tasked with responding to immediate needs while trying to deal with infrastructure gaps that limit their ability to address long-term solutions. Communities are deeply affected, with individuals and families enduring the trauma of homelessness and neighbourhoods saying that long-term homelessness and people living outdoors are unacceptable, demanding urgent action from governments.

Based on data collection from service managers,

IN 2024 FUNDING FOR HOUSING AND HOMELESSNESS PROGRAMS IN ONTARIO WAS AN ESTIMATED **\$4.1 billion,**

combining contributions from municipal, provincial, and federal governments. These funds support various services, including homelessness prevention, emergency shelters, transitional housing, supportive housing, and affordable housing.

Municipal contributions accounted for



WHILE THE DATA IN THIS REPORT AND FUNDING ANALYSIS INCLUDES EXPENDITURES REPORTED BY MUNICIPAL SERVICE MANAGERS, IT DOES NOT ACCOUNT FOR THE FULL SCOPE OF FUNDING DIRECTED TO HOMELESSNESS AND HOUSING IN ONTARIO, SUCH AS INVESTMENTS BY ONTARIO ABORIGINAL HOUSING SERVICES OR HOUSING PROVIDERS FUNDED THROUGH THE MINISTRY OF HEALTH.

NONETHELESS, THIS REFLECTS THE CRITICAL ROLE MUNICIPALITIES PLAY IN ADDRESSING HOMELESSNESS.

In housing, municipalities have increasingly stepped in to address mounting pressures, providing 65.6% of total estimated housing funding in 2024. Those contributions have been essential to maintaining services and meeting the urgent needs of people experiencing homelessness. However, the scale of the issue—and the infrastructure required to solve it—extends far beyond what municipalities alone can sustainably fund. Chronic homelessness—a flashing red signal for system strain—remains proportionally high and growing, highlighting the urgent need to create more spaces where individuals can successfully exit homelessness while also curbing and preventing the number of people experiencing homelessness in the future.

Without significant investment and coordination across all three levels of government, it will not be possible to scale up the infrastructure needed to create a system where homelessness is rare, brief, and non-recurring.

An End to Chronic Homelessness

Ontario's homelessness crisis is significant, but it is not unresolvable. Chronic homelessness is a clear signal of an overburdened and misaligned system, but that can be addressed with bold and coordinated action. Ending chronic homelessness requires a focused, long-term investment that targets root causes, optimizes system capacity, and ensures that housing and supports meet the needs of Ontarians.

A 10-year scenario was modelled to explore what it would take to achieve **functional zero chronic homelessness**. The analysis determined that an **\$11-billion investment over 10 years** would:

01

Create **75,050 new housing and support spaces**, ensuring the infrastructure exists to house people permanently.

02

Address systemic causes by focusing on **prevention, supportive housing, and sustainable exits** from homelessness.

03

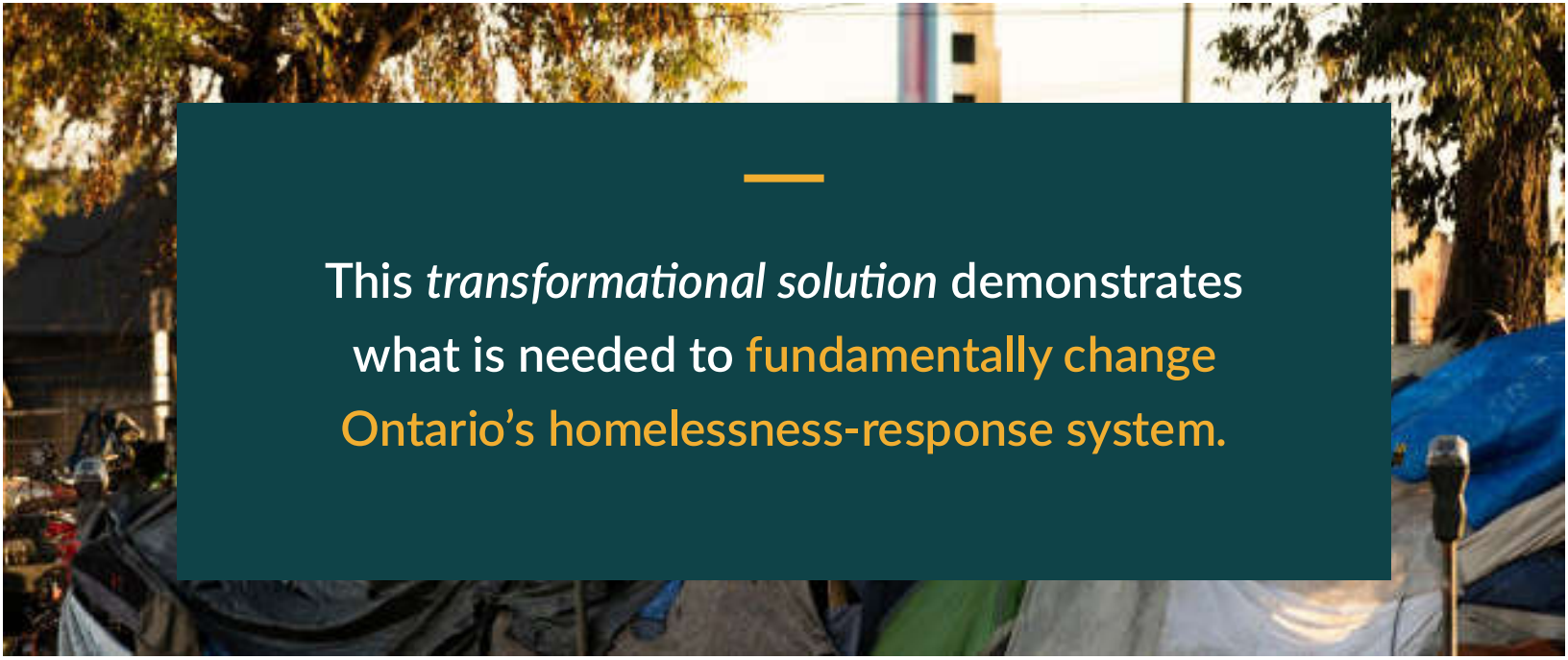
Shift resources from crisis management to long-term stability, reducing reliance on emergency systems like shelters and hospitals.

04

Build healthier, more resilient communities by alleviating strain on municipalities and service providers.

05

Provide a foundation to optimize and improve outcomes across critical systems, including health, justice, immigration settlement, education, and financial support systems.



This transformational solution demonstrates what is needed to fundamentally change Ontario's homelessness-response system.

Modelling Urgent Pressures

The most cost-effective and sustainable solution to homelessness is to end chronic homelessness and prevent people from becoming unhoused in the first place. Acknowledging that encampments are an urgent pressure point across Ontario, a scenario was designed to model what a **fixed \$2-billion investment** could achieve toward preventing and resolving encampments.

In this model, \$2.017 billion could provide:



5,700
new housing and
support spaces

TO QUICKLY STABILIZE AND
TRANSITION PEOPLE OUT OF
ENCAMPMENTS.

SUPPORT FOR AN INITIAL

8,400 people to transition into housing, reducing visible pressures on communities and service systems.

Recognizing the unique challenges faced by Northern Ontario, it is suggested that up to



20% OF THESE INVESTMENTS

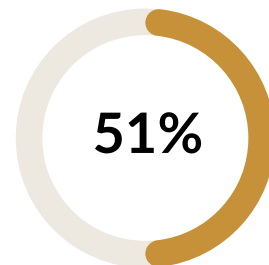
be allocated to address capacity gaps, issues created by geographic isolation, and the overrepresentation of Indigenous populations in homelessness.

While focusing solely on encampments misses the broader opportunity to sustainably address homelessness as a whole, this approach offers a housing-focused alternative that could swiftly house people experiencing homelessness in encampments. By investing strategically, it avoids the inefficiencies and missed opportunities of a reactive and temporary response to encampments.

A Defining Moment for Ontario's Future

Known homelessness in Ontario has risen by an estimated 51% since 2016, with chronic homelessness tripling during that time.

Known Homelessness



If left unaddressed, these numbers could more than triple by 2035, **with as many as 294,266 people experiencing homelessness**. This would place increasing pressure on municipalities, public services, and communities across the province, exacerbating the current stress on local resources, and affecting overall community wellbeing.

A deepening homelessness crisis in Ontario is not inevitable. Systemic gaps can and must be addressed through targeted investments, coordinated responses, and a commitment to long-term solutions. The solution is to build a system where emergency shelters serve as temporary interventions, not long-term housing solutions. By focusing on prevention, affordable housing, and culturally safe, community-led approaches, Ontario can reduce the inflow of homelessness and create stable exits for those currently trapped in cycles of unstable housing.

The benefits of decisive action are clear:

STRONGER AND SAFER COMMUNITIES

Supported by stable housing and equitable systems of care.

IMPROVED QUALITY OF LIFE

With fewer individuals and families in crisis.

REDUCED COSTS

As emergency responses are replaced by sustainable, long-term solutions that alleviate pressures on municipalities and public systems.

ENHANCED LOCAL ECONOMIES

As stable housing fosters increased consumer activity, workforce participation, and community investment.

ONTARIO HAS AN OPPORTUNITY TO CREATE A FUTURE WHERE HOMELESSNESS IS RARE, BRIEF, AND NON-RECURRING. THIS REQUIRES BOLD, EVIDENCE-BASED DECISIONS AND COORDINATED ACTION ACROSS ALL LEVELS OF GOVERNMENT.



With the right investments and continued collaboration, the province can *build a system that ensures every Ontarian has a place to call home, strengthening the resilience and wellbeing of communities for generations to come.*

Introduction

HOMELESSNESS IN ONTARIO IS A SYSTEMIC CRISIS THAT REQUIRES BOLD, COORDINATED ACTION TO ACHIEVE FUNCTIONAL ZERO—A STATE WHERE HOMELESSNESS IS RARE, BRIEF, AND NON-RECURRING.

This goal is ambitious. But it is achievable with evidence-driven solutions, alignment across jurisdictions, and investments that target the root causes of housing instability.

This report provides a comprehensive, province-wide analysis of homelessness, leveraging data from all 47 service managers. Developed in collaboration with the Association of Municipalities of Ontario (AMO), the Ontario Municipal Social Services Association (OMSSA), and the Northern Ontario Service Deliverers Association (NOSDA), the report offers an unprecedented examination of the scale, scope, and systemic changes required to effectively address homelessness in Ontario. The work is a testament to the significant progress in data collection and analysis capacity across the province, progress that has made it possible to undertake an exercise of this magnitude. The data provides a valuable and compelling picture of the homelessness landscape, but it is not without limitations, which are noted, as relevant, elsewhere in the report.

Impressive local successes and innovations driven by service managers cannot overcome a system that remains fundamentally misaligned because of the complex and diverse housing needs across Ontario.

HOWEVER, THIS REPORT ACKNOWLEDGES AND BUILDS ON THOSE LOCAL SUCCESSES TO MAKE THE CASE FOR ALIGNING EFFORTS, SCALING SOLUTIONS, AND TARGETING INVESTMENTS THAT CAN WORK AT A PROVINCIAL LEVEL.





The report is organized around three core areas of inquiry. Each explores actionable solutions and critical gaps.

Part 1: A New Look at Housing and Homelessness in Ontario

- What is the current state of homelessness across Ontario?
- How do the experiences of homelessness vary across regions and populations?
- What capacity exists in Ontario's current housing and homelessness-serving systems?
- Where are the critical gaps in infrastructure and support?

Part 2: A 10-Year Perspective on Homelessness in Ontario

- How might homelessness evolve over the next decade?
- What factors will most influence future trends?
- What scenarios should communities prepare for?
- What are the risks of not taking action?

Part 3: Investing in Solutions

- What investments are needed to achieve functional zero in chronic homelessness?
- How can systems be better aligned to prevent and respond to homelessness?
- What specific actions will make the biggest difference?
- How can resources be allocated most effectively?

Key Terms

Known Homelessness

Known homelessness refers to people known to the homelessness-serving system, through service provision or data collection and prioritization activities, such as a By-Name List (BNL), Point-in-Time (PiT) count, or other tools. This primarily includes people experiencing sheltered or unsheltered homelessness—those staying in emergency shelters, hotels, or unsheltered locations like tents or outdoor spaces. Occasionally, a small proportion of individuals experiencing hidden homelessness may also be included, depending on how service managers reported their data.

This term is used throughout the report and is **bolded for clarity**.



Service Managers: Entities responsible for planning, managing, and delivering local human services in Ontario. This includes both Consolidated Municipal Service Managers and District Social Services Administration Boards.

Consolidated Municipal Service Managers: Upper-tier (regional) and single-tier municipal governments across Ontario designated to manage social services, such as income support, child care, and social housing.

District Social Services Administration Boards: Boards established in areas of Northern Ontario where no upper-tier municipality exists, and responsible for delivering social services similar to Consolidated Municipal Service Managers.

Northern/Non-Northern: For the purposes of this project, northern communities include all District Social Services Administration Boards and the City of Greater Sudbury, a Consolidated Municipal Service Manager. Non-northern communities include all other Consolidated Municipal Service Managers across Ontario.

By-Name List: A real-time, up-to-date record of all people experiencing homelessness in a community. Each entry includes personal details—such as name, history of homelessness, health status, and housing needs—collected and shared with the person's consent.

PiT Counts: A snapshot of people experiencing homelessness in a community on a single night, including those in shelters and sleeping outdoors and, in some cases, people experiencing hidden homelessness (temporarily staying with others).

Chronic Homelessness: The national definition of chronic homelessness covers experiences of homelessness in both sheltered and unsheltered areas, as well as experiences of hidden homelessness. This refers to people who are currently experiencing homelessness and meet at least one of the following criteria:

- They have experienced homelessness for a total of at least six months (180 days) over the past year, or
- They have recurrent experiences of homelessness over the past three years, with a cumulative duration of at least 18 months (546 days).

Hidden Homelessness: People without permanent housing who temporarily stay with friends, family, or in other informal arrangements, often referred to as 'couch-surfing.'

Acuity: The level of complexity of a person's needs and challenges, often used to determine the intensity of support services required. High acuity indicates complex, ongoing needs requiring intensive support.

Functional Zero: A state where homelessness is rare, brief, and non-recurring. Achieving functional zero means that the number of people experiencing homelessness at any time does not exceed the community's capacity to ensure they are quickly rehoused.

Positive Exit: A sustainable and permanent transition of someone out of homelessness into stable housing that meets individual or family needs.

Negative Exit: When someone returns to homelessness after a housing placement or leaves a program without achieving stable housing.

Emergency Shelter: Short-term accommodations designed to provide immediate, temporary refuge for people experiencing homelessness. Emergency shelters often offer basic services, such as meals, hygiene facilities, and referrals to other housing and support programs, but are not intended as long-term solutions to homelessness.

Transitional Housing: Temporary, time-limited housing with support services intended to help people transition toward permanent housing. However, there is no standardized definition across jurisdictions. Some models resemble permanent housing with formal leases, while others impose stricter timelines and program requirements, with varying levels of support.

Supportive Housing: Housing paired with individualized support services, such as case management, mental-health care, and substance-use supports, typically designed to serve people with more complex challenges. However, supportive housing operates across a wide range of models in both policy and practice, with differences in tenancy arrangements, support intensity, and the acuity levels of the populations served. Some supportive housing units are delivered through the housing and homelessness system, while others are funded and managed within health systems, such as programs overseen by the Ministry of Health. **In this report, all references to supportive housing refer specifically to units operated through the housing and homelessness system.**

Methodology

THIS PROJECT USED AN INNOVATIVE, THREE-PART METHODOLOGY TO ANALYZE AND PROJECT HOMELESSNESS TRENDS ACROSS ONTARIO.

Designed to address a challenge of this scale, the methodology represents one of the most comprehensive efforts of its kind in the province. The data-collection process was extensive, but not without limitations. However, the results provide a robust foundation for understanding homelessness today and planning how to address it now and into the future.



Part 1: A New Look at Housing and Homelessness in Ontario

Focused on collecting and standardizing data from service managers, to capture the scale and scope of homelessness and available supports across Ontario.



Part 2: A 10-Year Perspective on Homelessness in Ontario

Used the standardized data from Part 1 to project homelessness trends through 2035, examining how socioeconomic factors influence future outcomes under different scenarios.



Part 3: Investing in Solutions

Used the outputs from Part 2 to estimate future space and resource requirements, identifying gaps between current system capacity and anticipated needs.

A robust foundation for *understanding homelessness* today and **planning how to address it now and into the future.**

Part 1:

A New Look at Housing and Homelessness in Ontario

THE FIRST PHASE OF THE PROJECT FOCUSED ON COLLECTING AND STANDARDIZING DATA FROM 47 SERVICE MANAGERS ACROSS ONTARIO, IN ORDER TO UNDERSTAND THE CURRENT STATE OF HOMELESSNESS AND AVAILABLE SUPPORTS. WITH ALL SERVICE MANAGERS PARTICIPATING, THE DATASET REPRESENTS AN IMPORTANT AND RELIABLE FOUNDATION.



Primary data was collected using a standardized template, which captured information about By-Name Lists, emergency shelter occupancy, Point-in-Time (PiT) counts, and program performance metrics. Communities with limited resources or incomplete records were encouraged to provide estimates to ensure broad representation. Secondary sources, such as historical reports and public datasets, like Statistics Canada's Shelter Capacity reports, supplemented the primary data, particularly in northern areas.

To improve comparisons across regions, the data was standardized. Information provided in different formats was converted into annualized figures, and key definitions, such as chronic homelessness and housing capacity, were also standardized to align with provincial and federal definitions. Where gaps persisted, statistical methods like linear regression and trend analysis were applied to estimate missing values. However, differences in reporting practices across departments—for example, housing, financial, and performance units—meant that perfect consistency was not achievable.

The standardized template and general reporting categories helped ensure participation by all service managers. However, the complexities and nuances of local systems may not have been fully captured by these tools. Differences in reporting practices across regions added further variability, particularly in rural and northern areas, where service coverage is often limited. Additionally, historical data gaps and disruptions caused by the COVID-19 pandemic affected the completeness and consistency of the dataset. As always, undercounting remains a concern, as no region can fully capture the entire population of those experiencing homelessness.

Hidden Homelessness

HIDDEN HOMELESSNESS REFERS TO INDIVIDUALS STAYING IN INFORMAL OR TEMPORARY ACCOMMODATIONS, SUCH AS COUCH-SURFING OR STAYING WITH FRIENDS OR FAMILY, WITHOUT FORMAL SUPPORT.

While some people experiencing hidden homelessness may be included in this dataset—typically they are those known to the system through a By-Name List (BNL) or other service interactions—the data does not come close to capturing the full scope of hidden homelessness. This project was not designed to identify those who remain entirely outside the reach of formal systems.

As a result, the dataset reflects only a fraction of those living in such precarious circumstances.

This limitation highlights the need for further research to determine the extent and characteristics of hidden homelessness, particularly for people who are not engaged with services or documented in existing systems.



Part 2:

A 10-Year Perspective on Homelessness in Ontario

THE SECOND PHASE OF THE PROJECT USED STATISTICAL MODELLING TO PROJECT FUTURE HOMELESSNESS TRENDS IN ONTARIO THROUGH 2035. THIS ANALYSIS AIMED TO IDENTIFY HOW SOCIOECONOMIC FACTORS, SUCH AS UNEMPLOYMENT, INCOME, AND HOUSING AFFORDABILITY, INFLUENCE HOMELESSNESS OVER TIME. THE RESULTS PROVIDE INSIGHTS INTO HOW DIFFERENT FUTURE CONDITIONS MIGHT SHAPE THE SCALE OF HOMELESSNESS ACROSS THE PROVINCE.

The model relied on the standardized data from Part 1, combined with additional socioeconomic data, including Census data (2016 and 2021), CMHC Core Housing Needs data, and other public datasets. These inputs included population growth, unemployment rates, median household income, and the prevalence of households with core housing needs. Together, these factors created a picture of how economic and social changes might affect homelessness.

The model used multiple linear regression to project homelessness trends, a statistical method that found relationships between homelessness and key factors like income or unemployment.

By analyzing these relationships, the model estimated future homelessness levels under three scenarios: economic steady, economic upturn, and economic downturn. These scenarios explored how changes in socioeconomic conditions, such as job growth or housing affordability, might affect the number of people experiencing homelessness.

WHILE THE PROJECTIONS PROVIDE VALUABLE INSIGHTS, THEY ALSO HAVE LIMITATIONS.

The model assumes that relationships between income and homelessness remain consistent over time, which may not account for unexpected changes, such as policy shifts or economic shocks.

Part 3:

Investing in Solutions

THE THIRD PHASE OF THIS PROJECT FOCUSED ON ESTIMATING FUTURE SPACE AND RESOURCE REQUIREMENTS FOR HOMELESSNESS PROGRAMS ACROSS ONTARIO. BUILDING ON THE PROJECTIONS DEVELOPED IN PART 2, THIS PHASE TRANSLATED THE ANTICIPATED TRENDS IN HOMELESSNESS INTO PRACTICAL ESTIMATES OF CAPACITY NEEDS, TO IDENTIFY GAPS IN THE SYSTEM AND HIGHLIGHT AREAS FOR INTERVENTION.

Scenario modelling, using data from Part 1, which includes information on homelessness and housing supports, was created to inform those estimates. Factors considered included the presumed distribution of needs for those experiencing chronic homelessness, particularly in the context of acuity; the percentage of successful housing placements; the proportion of placements resulting in negative exits (that is, returning to homelessness); and average costs reported by service managers. The modelling emphasized interventions designed to prevent inflow into homelessness and to facilitate positive exits, such as permanent housing, recognizing that shelters are not long-term solutions.



The analysis has important limitations.

First, the reported capacity reflects service managers' understanding of the homelessness-serving system in their regions. For large and complex systems, there may be underreporting of capacities or gaps in considering the full scope of available resources. However, thanks to strong participation by service managers across Ontario, the dataset still provides a strong foundation for analysis and planning purposes.

Second, homelessness is a multi-system failure that requires well-functioning social infrastructure in several areas to prevent and respond effectively. While the modelling discussed in this report focused on key homelessness and housing supports necessary to increase positive exits from homelessness, broader supports are critical to address root causes and sustain long-term stability. These include mental-health treatment, substance-use services, employment and job training programs, family reunification, income supports, and life-skills development.

As important as the above supports are, addressing homelessness also requires adequate housing options. This modelling emphasizes the importance of focusing on housing and prevention as the foundation for a system capable of ending homelessness.

Interpreting the Data

Each part of this project is complex and interconnected, with its own methodology, limitations, and definitions. To support transparency and help readers interpret the findings, several tools are provided throughout the report:

- Each subsection includes a methodology and limitations section. These sections explain the approach taken, highlight any gaps, and provide tips on how to read and understand the data. They are designed to be accessible to all audiences.
- For those seeking more detailed explanations, additional technical notes are included in the appendix.
- In Part 1, tables are included below most charts. These tables show how many service managers reported data for a specific year or measure and the percentage of the population they represent. The data shown in these tables reflects submission rates prior to any adjustments and helps provide context about the level of data completion.

Example

	2016	2017	2018	2019	2020	2021	2022	2023	2024
SM Count	11	10	24	20	24	37	46	47	47
Population %	13%	12%	54%	63%	73%	85%	96%	100%	100%

Table xx: Submission rate for Figure 1: Number of People Experiencing Homelessness in Northern and Non-Northern Communities, Ontario, 2016–2024

For some measures, adjusted data is presented, where gaps were addressed using additional desk research or reliable statistical estimates to provide a more complete picture. For other measures, unadjusted data is shown, reflecting the numbers exactly as reported. Adjustments were made only when it could be done responsibly, and publicly available information aligned with collected sources.

Throughout Part 1, this legend will help you distinguish between the two.

Adjusted

Missing values have been filled using additional research or statistical methods.

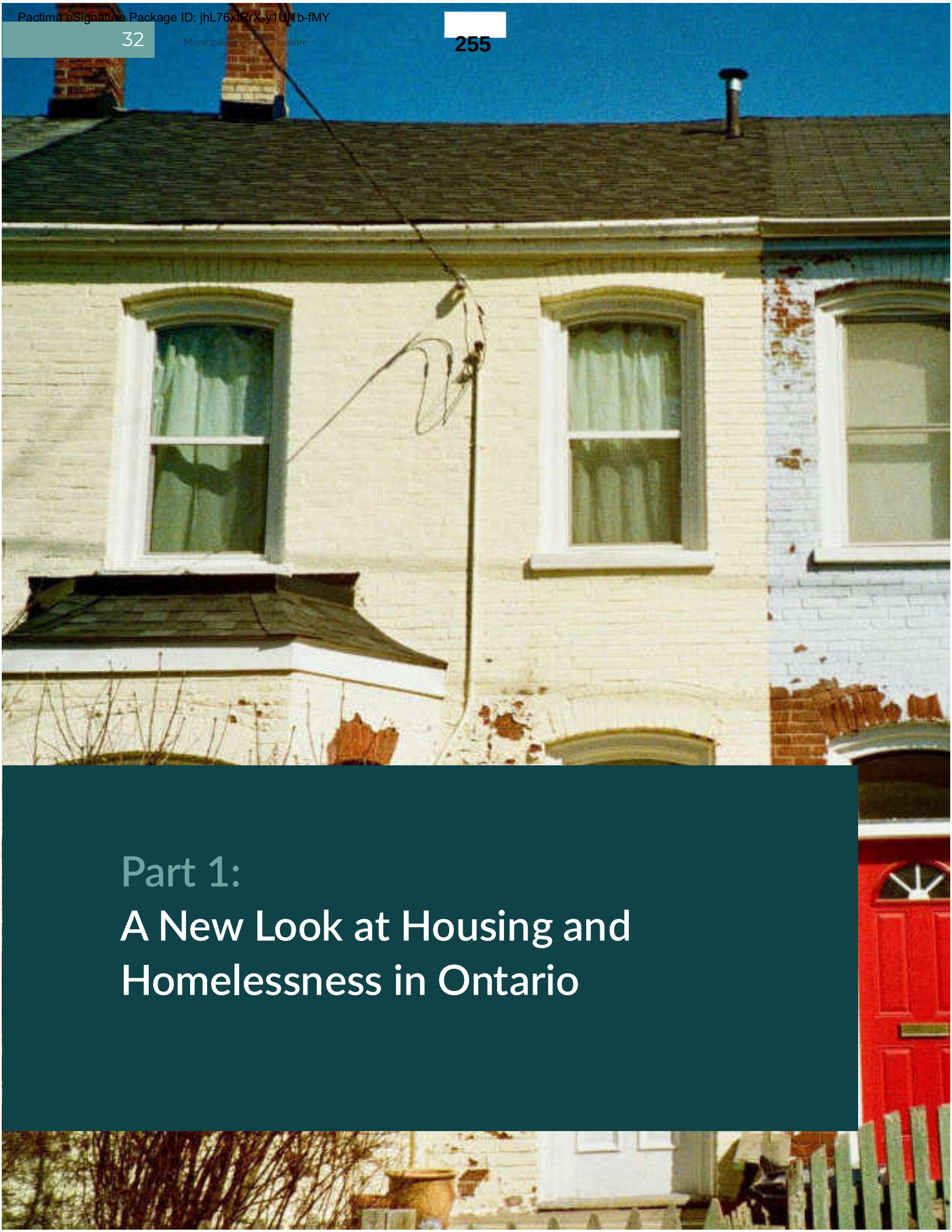
Unadjusted

Figures are presented as reported, without adjustments for missing values.



Chronic Homelessness is a Warning Sign

OUR ALREADY UNACCEPTABLE HOUSING
PROBLEM IS ON A TRAJECTORY TO GET WORSE



Part 1: A New Look at Housing and Homelessness in Ontario

Part 1 reflects the significant efforts of Ontario's 47 service managers, all of whom participated in this first-of-its-kind data-collection effort. This work offers unprecedented insights into the scale, scope, and regional variations in homelessness, sector capacity, expenditures, and more. While no data-collection effort can capture every aspect of the homelessness-serving system or all the sectors involved in working to prevent and end homelessness, this report represents an innovative and promising step forward in understanding and addressing the issue.

1.1 People Experiencing Homelessness

OVER THE PAST DECADE, SIGNIFICANT EFFORTS HAVE BEEN MADE TO ENUMERATE HOMELESSNESS, IMPROVE DATA COLLECTION, AND ENABLE EVIDENCE-BASED DECISION-MAKING.

These efforts aim to define the scope of homelessness, clarify its effects on individuals, families, and communities, and hold systems accountable for change. But quantifying homelessness remains incredibly challenging. Conflicting data systems, inconsistent definitions, and the fluid nature of homelessness create major barriers to developing a consistent estimate of the true extent of homelessness in Ontario.

This report represents the first effort to aggregate and standardize data across all service managers in Ontario, providing a provincial estimate of annual homelessness. The findings below illustrate the scope of the crisis: homelessness in Ontario has grown by more than 50% in eight years, with the annual number of people experiencing homelessness rising to an estimated 81,515 in 2024.

Like any large-scale enumeration effort, this analysis has limitations, as outlined in the data section below. However, the rigour of this analysis and the trends it uncovers reveal an escalating crisis. But it is a crisis that can realistically be solved.

Methods and Limitations

To ensure a consistent and comparable picture of homelessness across Ontario, we standardized data from 47 service managers. By applying data standardization techniques, we aligned information from varied sources, including By-Name Lists, emergency shelter records, Point-in-Time (PiT) counts, Period Prevalence Counts (PPCs) and other reports, into a single cohesive dataset.

Key limitations of the methodology are described below.

01

Regional Variability and Data Quality: Data quality varies significantly across regions due to differences in local resources, reporting practices, definitions, and tracking systems. Older data, particularly from 2016 to 2020, was often incomplete or inconsistent, leading to gaps in confirming homelessness trends during those years.

02

Exclusions: These estimates capture only people known to the system through service use, enumeration efforts, or consent to be included on a By-Name List in areas covered by service managers. They exclude people experiencing hidden homelessness (e.g., staying with friends or family) and people in institutional settings (e.g., hospitals, correctional facilities, and provincially operated shelters like Violence Against Women shelters).

03

On-Reserve/Off-Reserve Enumeration: Estimates are limited to data from service managers and primarily including people who have accessed services, consented to be included on By-Name Lists, or were captured in research efforts and reporting. This approach is inadequate for enumerating homelessness among First Nations people living on reserve if they have not accessed services or become known to the system within a reporting year. The high representation of Indigenous people among those experiencing homelessness highlights the enduring effects of colonialism, systemic inequities, historical displacement, and a lack of appropriate funding. This issue is discussed further in **Section 1.3: Chronic Homelessness**.

04

COVID-19 Effects: Data-collection efforts and reporting practices changed substantially before and after the onset of the COVID-19 pandemic, complicating year-over-year comparisons and making it more difficult to identify trends over time.

05

Undercount: The above reasons, along with other factors like hidden homelessness that make homelessness enumeration challenging locally and difficult to aggregate regionally or provincially, means the data represents an almost-certain undercounting of homelessness in Ontario.

More information on the methodology for calculating the number of people experiencing homelessness can be found in the Technical Notes section.

Interpreting this Section

Annual Estimates vs. Point-in-Time Counts

The data in this section reflects annual estimates, which account for the fluid nature of homelessness. Unlike PiT counts, which capture a snapshot of homelessness on a single day, annual estimates account for people moving in and out of housing instability throughout the year.

Regional Definitions

For this analysis, northern communities are defined as those served by District Social Services Administration Boards, including:

- Algoma
- Nipissing
- Thunder Bay
- Cochrane
- Parry Sound
- Timiskaming
- Kenora
- Rainy River
- Manitoulin-Sudbury
- Sault Ste. Marie

The City of Greater Sudbury, a Consolidated Municipal Service Manager, is also included in the northern region. These definitions provide a consistent framework for analyzing geographic trends in homelessness.

Service Area Classifications

Service areas were classified by service managers based on unique regional characteristics. They self-identified as one of the following:

- Mostly urban
- Mostly rural
- Rural/urban mix

Findings

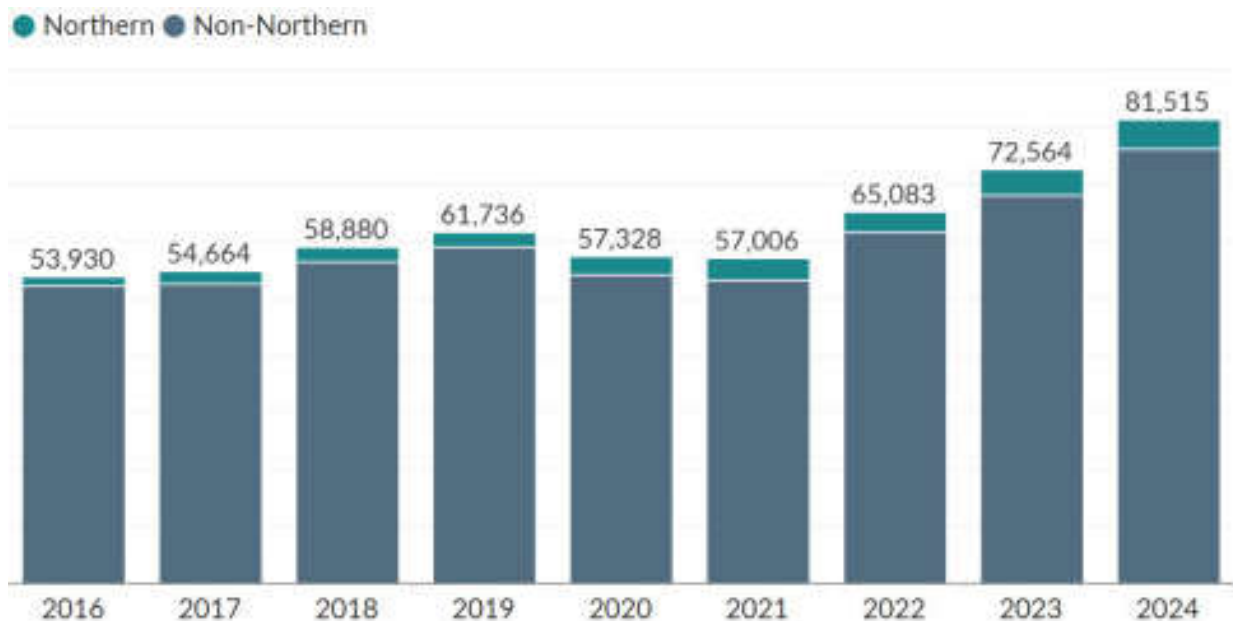
Homelessness in Ontario has grown by over 50% in eight years, with an estimated 12% increase since 2023

Between 2016 and 2024, the estimated number of people experiencing **known homelessness** rose from 53,930 to 81,515—a 51% increase. From 2023 to 2024, **known homelessness** increased by an estimated 12%.

This growth arises from a complex interplay of systemic and structural challenges, many of which predate the current crisis by decades.¹ Homelessness reflects broader societal inequities, and manifests through economic conditions, socioeconomic factors, population size, and demographic changes. The availability and affordability of housing, alongside support for health and mental health, substance use treatment, and income security, all influence vulnerability to homelessness. Policy decisions at municipal, provincial, and federal levels directly affect the scope and effectiveness of responses, while the capacity of support systems and patterns of resource allocation further affect these fundamental issues.

The current human toll of homelessness is undeniable and demands urgent action. With more than 81,515 people experiencing homelessness in Ontario in 2024, there are many thousands of disrupted lives and fractured families.

Figure 1: Estimated Number of People Experiencing Homelessness in Northern and Non-Northern Communities, Ontario, 2016–2024



Adjusted

Missing values have been filled using additional research or statistical methods.

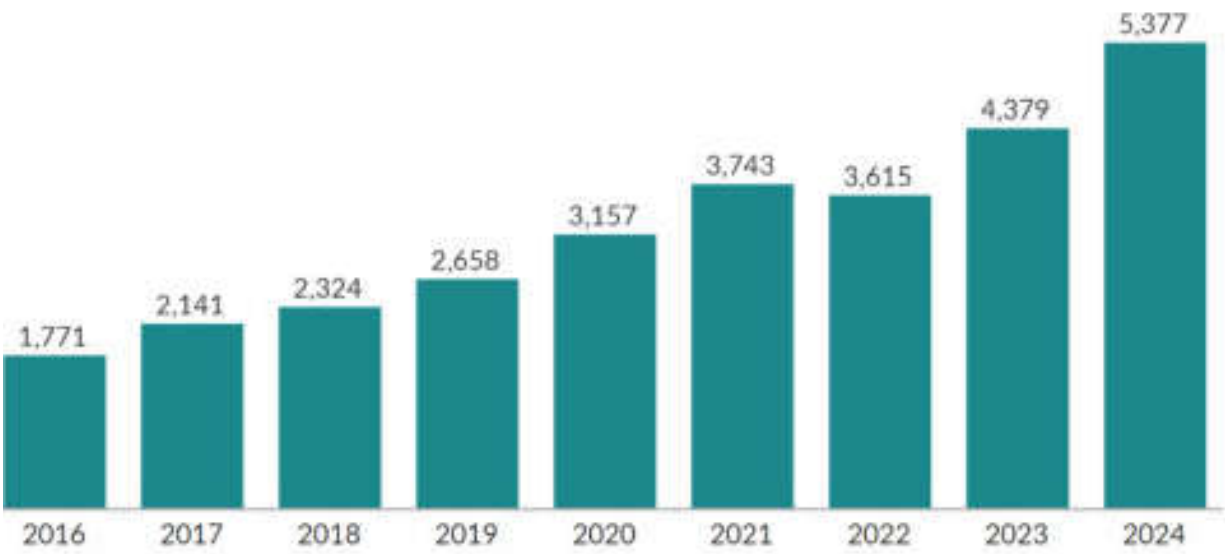
Table 1: Service Manager (SM) Response Rates for Number of People Experiencing Homelessness in Northern and Non-Northern Communities, Ontario, 2016–2024

	2016	2017	2018	2019	2020	2021	2022	2023	2024
SM Count	11	10	24	20	24	37	46	47	47
Population %	13%	12%	54%	63%	73%	85%	96%	100%	100%

Homelessness in Northern Ontario has grown four times faster than in non-northern communities

When isolating data from northern communities, a more pronounced increase emerges. An estimated 5,377 people experienced **known homelessness** annually in 2024—nearly triple the 1,771 recorded in 2016. This represents a 204% rise over eight years, outpacing the growth in non-northern areas.

Figure 2: Estimated Number of People Experiencing Homelessness in Northern Communities, Ontario, 2016–2024



Adjusted
Missing values have been filled using additional research or statistical methods.

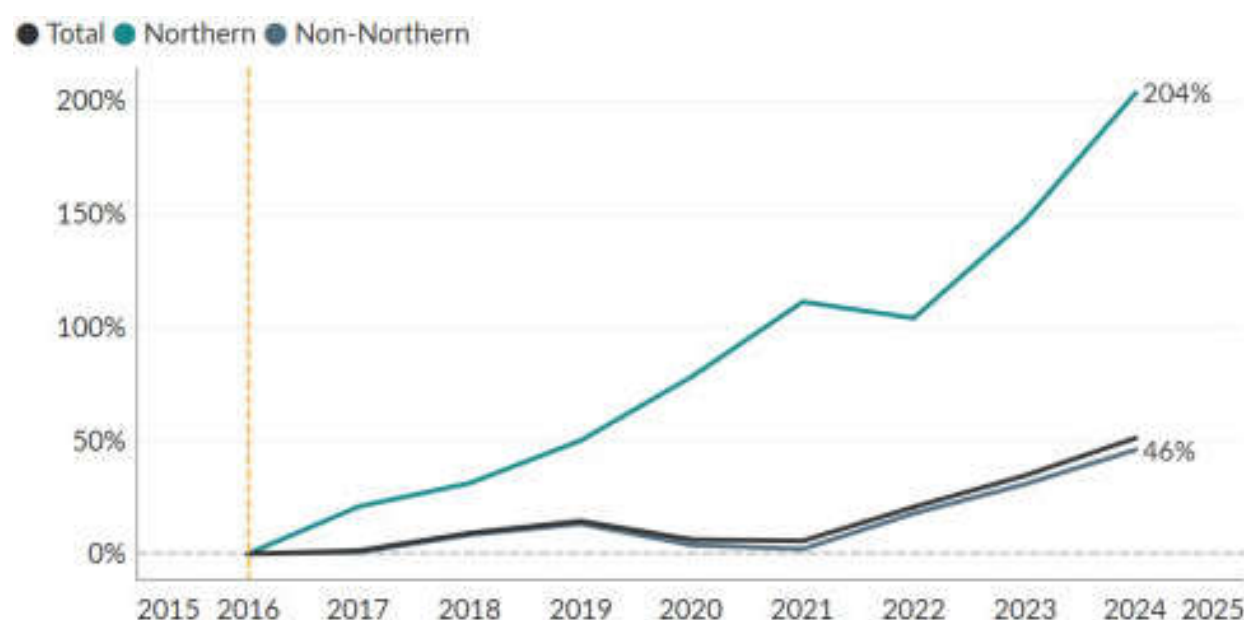
Table 2: Service Manager (SM) Submission Rates for Number of People Experiencing Homelessness in Northern Communities, Ontario, 2016–2024

	2016	2017	2018	2019	2020	2021	2022	2023	2024
SM Count	2	3	6	3	5	8	11	11	11
Population %	10%	12%	37%	12%	37%	53%	100%	100%	100%

While northern regions account for a smaller share of Ontario's overall population, the scale of the north's proportion of homelessness represents a deepening crisis in the north. Unique challenges, such as limited access to critical supports, geographic isolation, fewer housing options, and an inadequate transportation infrastructure, have exacerbated the issue.

Improved social infrastructure in recent years has led to better data collection and more people interacting with the system, and may have brought hidden homelessness to light. So some of the increase in homelessness in the north may be a matter of more accurate enumeration. However, it is more likely that the change reflects an actual rise in homelessness in Northern Ontario.

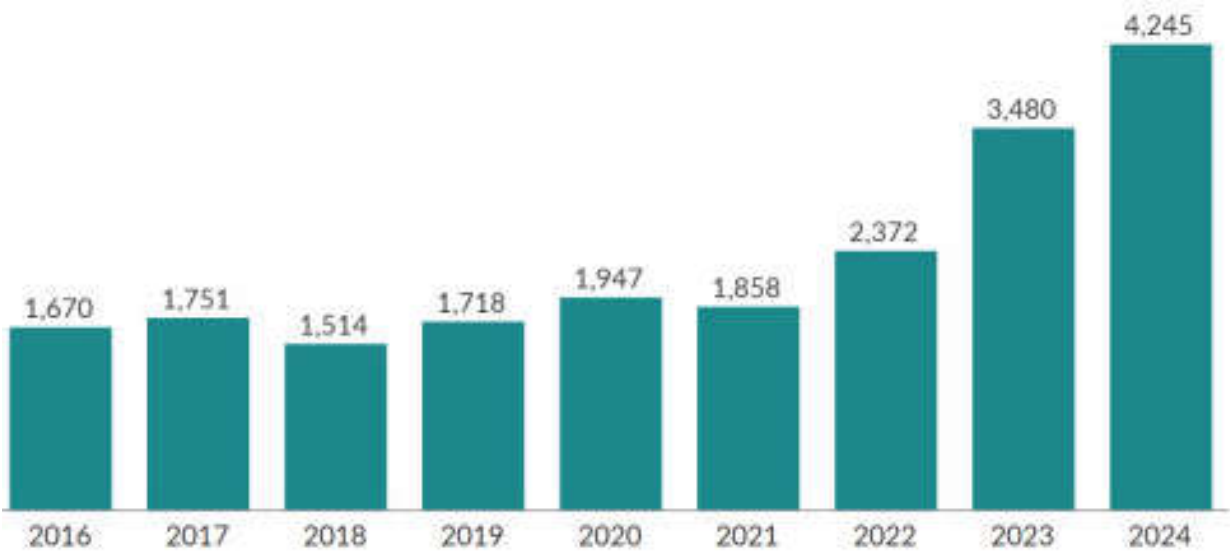
Figure 3: Percent Change in People Experiencing Homelessness from 2016 by Region, Ontario, 2016–2024



Rural homelessness is increasing at a faster rate than urban homelessness

In 2024, it is estimated that 4,245 people experience **known homelessness** annually in rural areas. While most estimates of homelessness represent an undercount, this is particularly true in rural areas. Factors such as fewer available services, vast geographic areas, and migration to urban centres to receive services contribute to the prevalence of hidden homelessness, making it difficult to capture the full extent of rural homelessness.

Figure 4: Estimated Number of People Experiencing Homelessness in Mostly Rural Communities, Ontario, 2016–2024



Adjusted

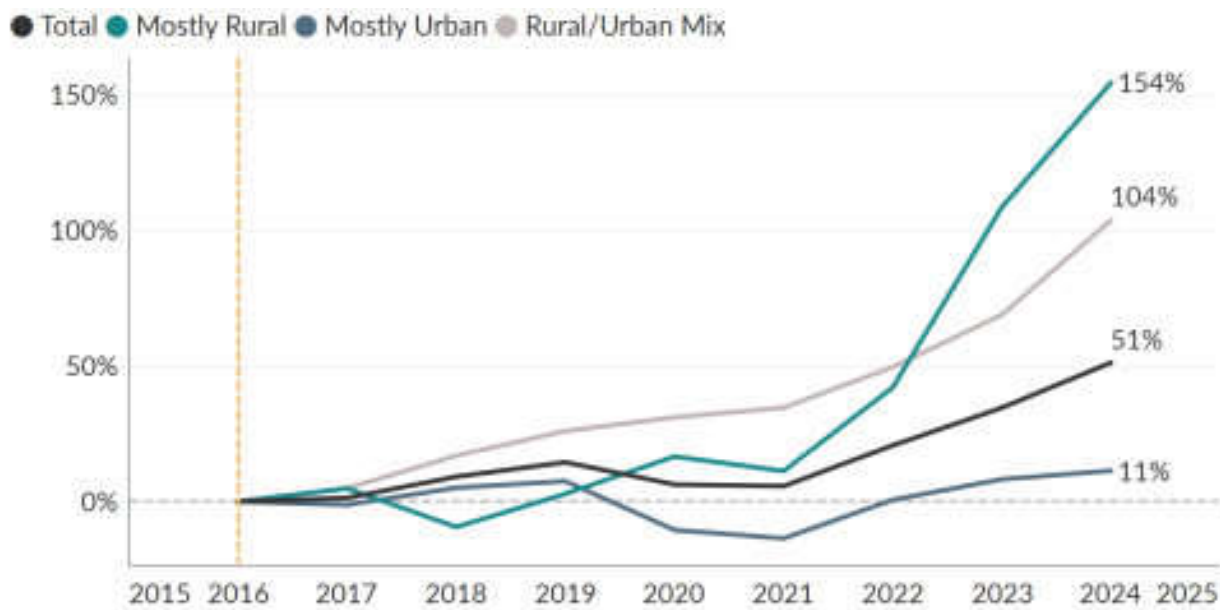
Missing values have been filled using additional research or statistical methods.

Table 3: Service Manager (SM) Submission Rates for Number of People Experiencing Homelessness in Mostly Rural Communities, Ontario, 2016–2024

	2016	2017	2018	2019	2020	2021	2022	2023	2024
SM Count	7	7	11	8	8	12	15	15	15
Population %	54%	48%	76%	55%	58%	81%	100%	100%	100%

The data shows that **known homelessness** in mostly rural areas has grown by 154% since 2016, outpacing the 104% increase in mixed rural-urban regions and the 11% increase in mostly urban areas, even when excluding estimates of hidden homelessness.

Figure 5: Percent Change in People Experiencing Homelessness from 2016, Mostly Rural, Rural/Urban Mix, and Mostly Urban Communities, Ontario, 2016–2024



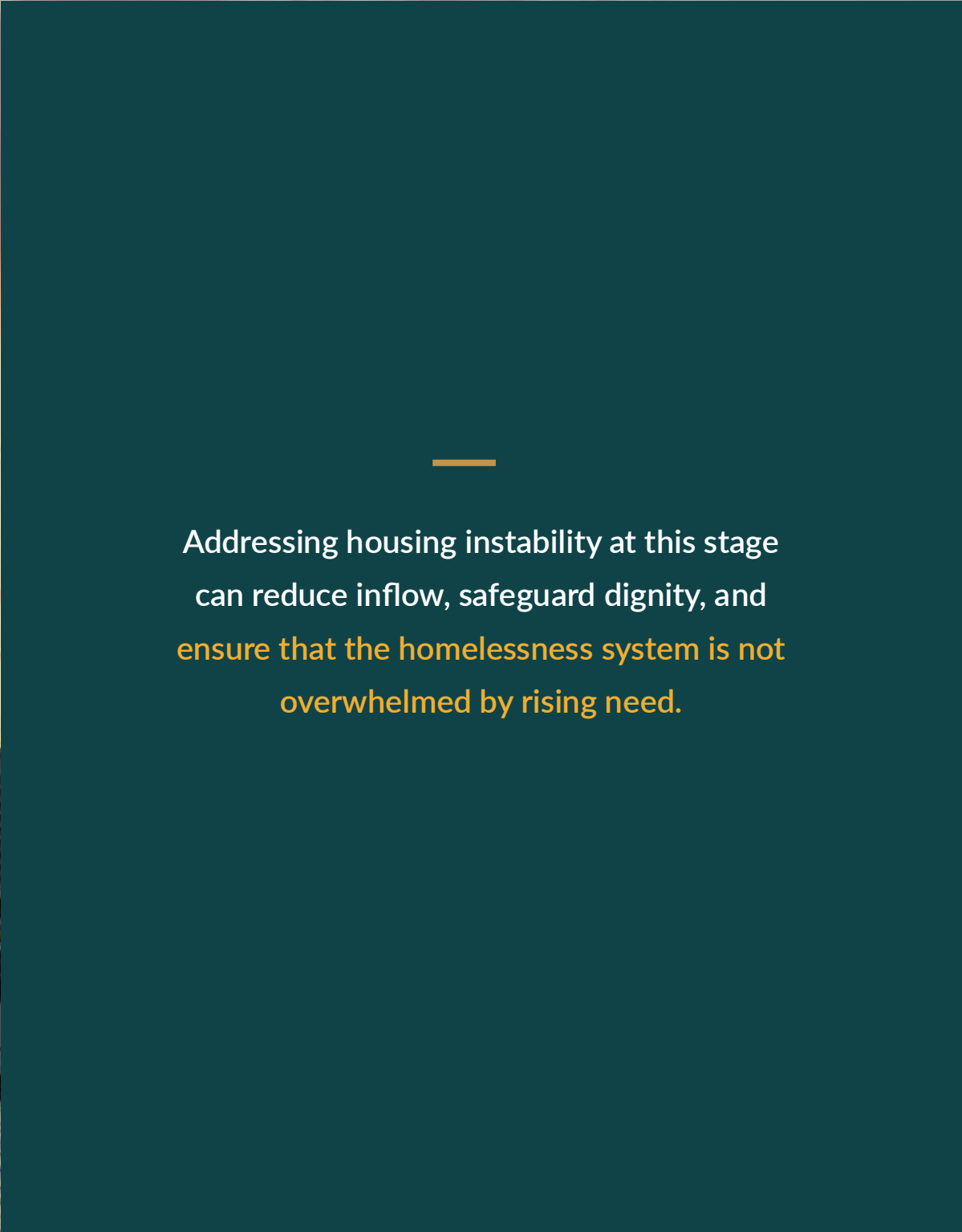
1.2: Indications of Housing Instability

TO END CHRONIC HOMELESSNESS, AS DEFINED BY FUNCTIONAL ZERO, ONTARIO'S HOUSING SYSTEM MUST FOCUS NOT ONLY ON PROVIDING TEMPORARY LANDING SPACES AND FACILITATING SUCCESSFUL EXITS, BUT ALSO ON REDUCING THE INFLOW OF PEOPLE ENTERING HOMELESSNESS.

Prevention is one of the most cost-effective and ethically sound strategies to achieve this goal. By stabilizing households before they reach a crisis point, prevention reduces the financial and human costs of homelessness while strengthening the overall system.

The data on community housing waitlists highlights the scale of housing instability and offers insight into the potential inflow into homelessness. In 2024, 268,241 households were on Ontario's waitlist for rent-geared-to-income (RGI) housing, a figure that includes a wide range of housing statuses, from those housed but at risk, to those who are precariously housed, to those already experiencing homelessness. With wait times now averaging nearly five years and stretching up to two decades in some situations, the waitlist reflects a system under immense strain. Census data and broader indicators of core housing need reinforce those findings, showing that affordability challenges and inadequate housing supply are widespread across the province.

As homelessness is projected to rise, as outlined in **Part 2: A 10-Year Perspective on Homelessness in Ontario**, the inflow into homelessness will also rise, unless there is targeted action, compounding existing challenges and escalating costs across the system. Community housing waitlists are more than indicators of demand—they also highlight a critical opportunity to intervene before more people fall into homelessness.



Addressing housing instability at this stage
can reduce inflow, safeguard dignity, and
ensure that the homelessness system is not
overwhelmed by rising need.



Methods and Limitations

Data on community housing waitlists was collected from 43 service managers for 2024. For the remaining four service managers, data from 2023 was used to estimate their 2024 numbers, applying the observed average year-over-year increase among service managers that provided data for both years. This ensured a consistent approach to estimating the total waitlist figures.

Key limitations of the methodology are described below.:

01

Exclusions and Backlogs: Waitlist figures do not capture all households seeking community housing. Application backlogs, eligibility restrictions, and other administrative barriers mean that some households in need may not appear on official waitlists, leading to an underrepresentation of actual demand.

02

Wait Time Estimations: Average wait times were calculated based on data from service managers reporting for 2024 and supplemented by data from the end of 2023 where available. Year-over-year increases were applied to estimate the average wait time for 2024, which introduces assumptions that may not account for all regional differences or changes in waitlist dynamics.

Further methodological details can be found in the Technical Notes section.

Interpreting this Section

Rent-Geared-to-Income (RGI) Housing

Rent-geared-to-income (RGI) housing is a form of subsidized housing designed to make rental accommodations affordable for low-income households. Tenants in RGI units typically pay 30% of their gross monthly income toward rent, with the remaining cost subsidized by government funding.

Understanding Housing and Homelessness Metrics

Homelessness and housing instability are interconnected but distinct conditions. Homelessness refers to the lack of a stable and adequate nighttime residence, while housing instability encompasses a broader range of challenges, such as unaffordable rent, overcrowding, or frequently moving. These designations are not mutually exclusive. People experiencing homelessness may appear on housing waitlists, and those in unstable housing may be at risk of homelessness.

It is important not to combine homelessness estimates with housing waitlist figures when calculating the total number of people in need. This approach risks double-counting and misrepresents the scale and complexity of housing challenges.

Findings

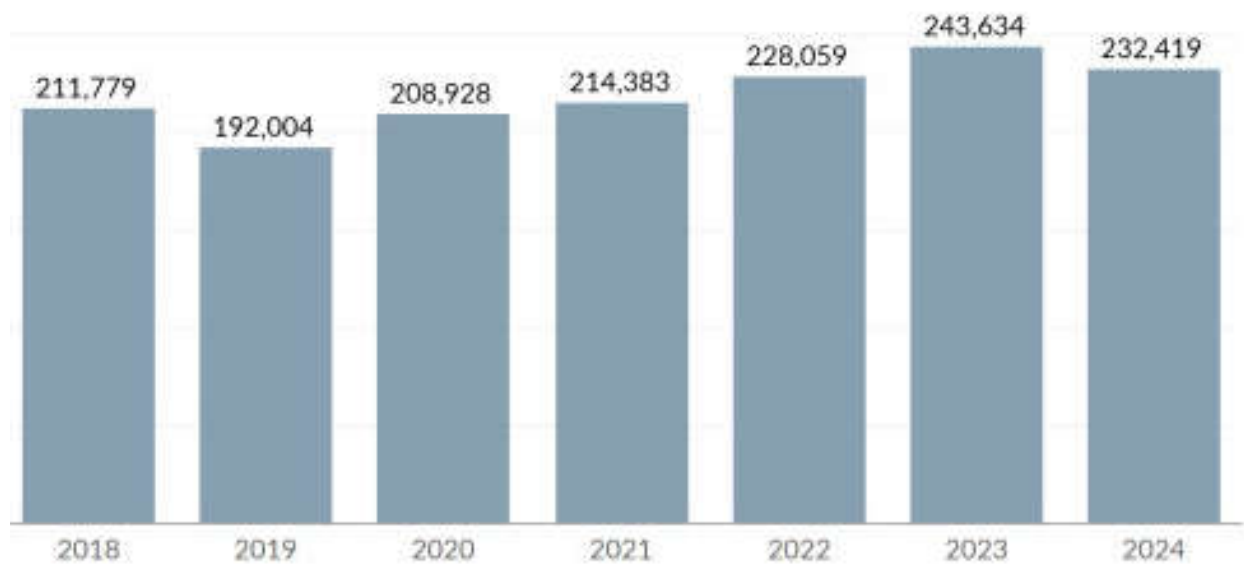
Up to 1 in 20 households on the waitlist for community housing

In 2024, Ontario's reported waitlist for rent-geared-to-income (RGI) housing included 232,419 households, based on data collected from service managers. As noted in the methodology, data gaps were addressed through standardization, where missing values were filled using additional research and reliable estimates.



The estimated total number of households on the waitlist is 268,241, reflecting a broad spectrum of housing instability. This includes those experiencing homelessness, those precariously housed, and those at risk of losing housing. The average wait time for RGI units remains just over five years (61 months), with significant regional variations.

Figure 6: Reported Number of Households on the Community Housing (RGI) Waitlist, Ontario, 2018–2024



Unadjusted

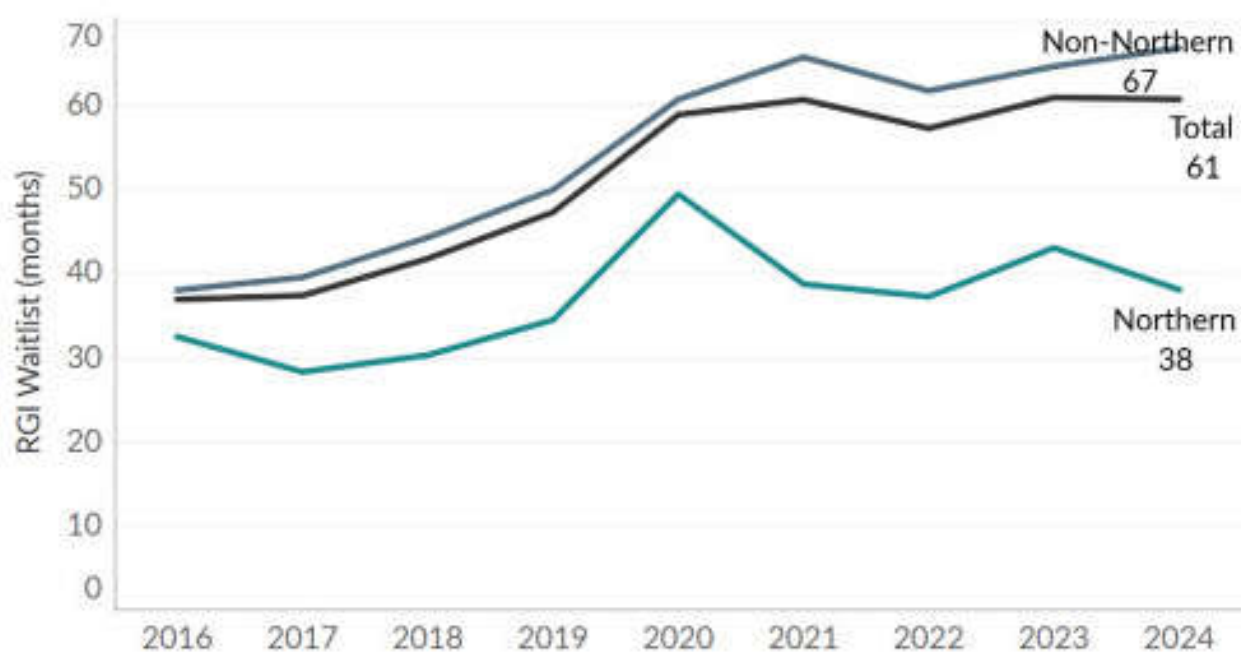
Figures are presented as reported, without adjustments for missing values.

Table 4: Service Manager (SM) Submission Rates for Number of Households on the Community Housing (RGI) Waitlist, Ontario, 2018–2024

	2018	2019	2020	2021	2022	2023	2024
SM Count	39	40	41	41	41	43	42
Population %	90%	91%	95%	95%	95%	97%	83%

Non-northern regions reported an average wait time of 67 months, compared to 38 months in northern areas. Despite shorter wait times in the north, many communities face severe capacity constraints, highlighting the systemic challenges of addressing housing needs in areas with limited infrastructure.

Figure 7: Reported Wait Times for Community Housing (RGI), Northern and Non-Northern Regions, Ontario, 2016–2024



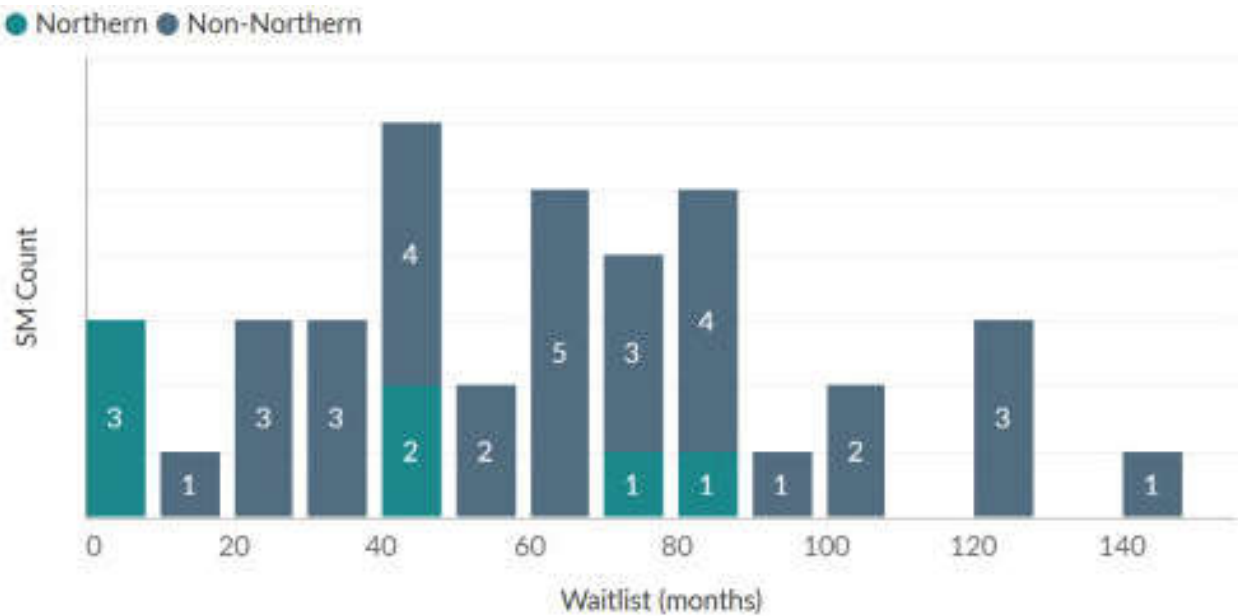
Unadjusted
Figures are presented as reported, without adjustments for missing values.

Table 5: Service Manager (SM) Submission Rates for Wait Times for Community Housing (RGI), Northern and Non-Northern Regions, Ontario, 2016–2024

		2016	2017	2018	2019	2020	2021	2022	2023	2024
Non-Northern	SM Count	20	21	23	24	26	26	27	29	26
	Population %	52%	53%	58%	58%	80%	80%	84%	87%	42%
Northern	SM Count	5	5	5	5	5	6	6	6	7
	Population %	46%	46%	46%	46%	46%	50%	50%	50%	60%
Total	SM Count	25	26	28	29	31	32	33	35	33
	Population %	52%	53%	57%	58%	78%	79%	83%	85%	43%

Waitlists also reveal extreme delays in some areas. The longest recorded average wait time for RGI housing in 2024 was 12 years (144 months), with a median wait time of 5 years (60 months). While the number of households on waitlists increased by 8.9% from 2023 among reporting service managers, these figures may understate the true demand for community housing. Backlogs in applications and administrative barriers prevent some households from being counted, suggesting that the need for affordable housing is even greater than these numbers indicate.

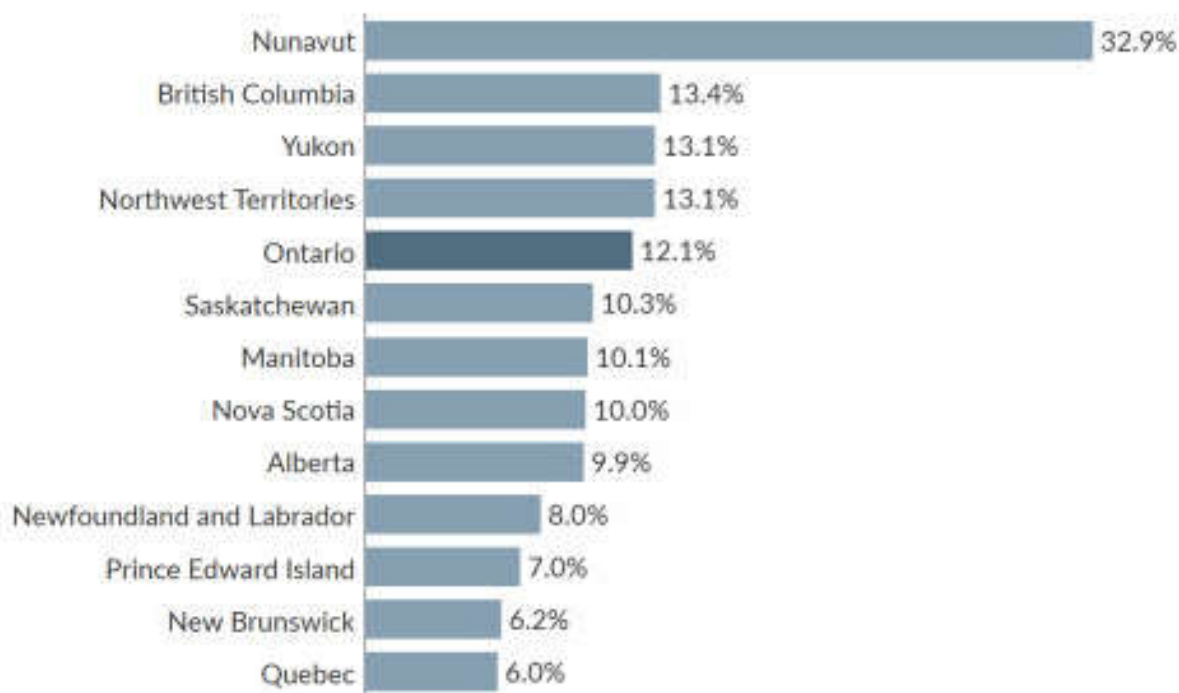
Figure 8: Service Manager (SM) Distribution of Adjusted Community Housing Wait Times by Region, Northern and Non-Northern, Ontario, 2024



Over 260,000 Ontario households face extreme housing cost burdens, spending more than half their income on shelter

Publicly available information highlights key trends in housing challenges across Ontario. According to the 2021 Census, Ontario's core housing need rate stands at 12.1%, placing it in the mid-range compared to other provinces and territories. Almost 640,000 households in Ontario are in core housing need, meaning their housing is unaffordable, inadequate, or unsuitable, and they cannot afford alternative local options that meet these standards.

Figure 9: Core Housing Need Rates by Province and Territory, Canada, 2021



However, this figure may underestimate the severity of housing instability due to temporary income supports during the COVID-19 pandemic, such as the Canada Emergency Response Benefit (CERB). These supports temporarily increased incomes for lower-income households, reducing the proportion of those spending 30% or more of their income on shelter costs. While shelter costs rose during this period, the income supports helped offset these increases, particularly benefiting renters.²

In addition, more than 260,000 households in Ontario face severe affordability challenges, spending 50% or more of their income on shelter costs. This represents 83% of the 575,080 households spending 30% or more of their income on housing. Renters are disproportionately affected, accounting for 62% of these households (359,370 households), while homeowners make up 38% (215,710 households).

Table 6: Households Spending 30% or More of Income on Shelter Costs by Tenure and Level of Shelter Cost Burden, Ontario, 2021

	Owner	Renter	Total
Spending 30% or more of income on shelter costs	215,710	359,370	575,080
30% to less than 50%	111,270	202,970	314,240
50% or more	104,440	156,400	260,840

In Ontario, housing affordability remains the dominant driver of core housing need, with 24.2% of households spending a significant portion of their income on shelter costs. In comparison, 5.7% of households experience inadequate housing, and 6.7% live in unsuitable housing.

However, provincial averages mask significant regional differences, particularly in Northern Ontario. Analysis of historical data shows that northern communities face disproportionately high rates of inadequate housing. Urban centres in Northern Ontario have some of the highest percentages of housing in need of major repairs, with smaller communities experiencing even greater challenges. In many cases, over 50% of housing units require major repairs, and for some communities, the figure reaches as high as 70% to 80%.³

The high levels of unaffordability, inadequacy, and unsuitability in housing highlight significant risks of increased inflow into homelessness.

Figure 10: Housing Challenges Across Canada: Regional Variations in Affordability, Inadequacy, and Unsuitability



Core housing need rates vary substantially across demographic groups, with an overall community rate of 12.1%. Single-mother-led households (23.1%) and refugee-claimant-led households (22.3%) have the highest CHN rates, followed closely by Black-led households (21.4%). Older adults (14.0% for heads over 65, 18.8% for heads over 85) and youth under 25 (17.3%) also face notable housing challenges.

As noted above, the 2021 data may understate current housing needs due to temporary financial assistance measures introduced during the COVID-19 pandemic.

Table 7: Households in Core Housing Need by Priority Population, Ontario, 2021

	Total Households	In Core Housing Need	Core Housing Need %
Single mother-led	447,885	103,275	23.1%
Refugee claimant-led	255,105	56,815	22.3%
Black-led	247,755	53,125	21.4%
New migrant-led	168,920	32,685	19.4%
Head of household over 85	181,830	34,090	18.8%
Head of household under 25	102,270	17,645	17.3%
Women-led	2,234,725	347,670	15.6%
Head of household member of racialized group	1,623,310	252,415	15.6%
Head of household over 65	1,504,935	210,110	14.0%
Transgender or non-binary	42,775	5,405	12.6%
Indigenous	193,885	23,965	12.4%
Household with physical activity limitation	1,506,880	156,710	10.4%
Household with cognitive, mental, or addictions activity limitation	892,720	89,095	10.0%
Ontario	5,272,360	639,810	12.1%

Source: Housing Needs Assessment Tool (HART)

Housing instability exposes deep inequities across Ontario's household

1.3: Chronic Homelessness

CHRONIC HOMELESSNESS HAS BECOME THE DEFINING CHARACTERISTIC OF HOMELESSNESS IN ONTARIO. IN LESS THAN A DECADE, THE NUMBER OF PEOPLE EXPERIENCING CHRONIC HOMELESSNESS HAS TRIPLED, REACHING OVER 41,512 PEOPLE IN 2024.

For the first time, more than half of all **known homelessness** is now chronic, a trend that reveals critical misalignments in how investments and capacity are being allocated.

Chronic homelessness signals that the system is not functioning as it should. In a healthy system, long-term homelessness is quickly addressed—or better yet, prevented entirely—by providing timely and effective pathways to housing stability. The persistent growth in chronic homelessness highlights systemic gaps in housing infrastructure, high-acuity supports, and prevention measures.

Northern communities face an especially urgent crisis. Chronic homelessness in Northern Ontario has nearly doubled since 2022, reflecting the infrastructure gaps and systemic inequities that disproportionately affect these regions. Meanwhile, children and youth now account for nearly one in four chronically homeless people, a reminder of the generational consequences of systemic inaction. Indigenous people and refugees, affected by structural inequities and histories of displacement, are also overrepresented in chronic homelessness, though their needs are often less visible because of the limitations of current systems and definitions.

Ontario's ability to end chronic homelessness requires a system that addresses the complexity and diversity of these experiences and also aligns funding, capacity, and targeted investments with goals. Fortunately, ending chronic homelessness is not an insurmountable challenge, as discussed in **Part 3: Investing in Solutions**.





Chronic Homelessness Signals

THAT THE SYSTEM IS NOT FUNCTIONING
AS IT SHOULD

Methods and Limitations

To establish a consistent and comparable understanding of chronic homelessness across Ontario, data from 47 service managers was standardized. This included aligning information from varied sources, such as By-Name Lists, emergency shelter records, and demographic reporting. The annual estimates were calculated using the weighted average percentage of chronic homelessness reported by service managers applied to the total number of people experiencing homelessness each year. For example, in 2024, a weighted average of 51% was applied to the estimated total of 81,515 people experiencing homelessness.

Key limitations of the methodology are described below.

01

Data Coverage Over Time: All 47 service managers reported chronic homelessness rates for 2024. A total of 46 had reported for 2023 and 2022, 36 for 2021, and only 15 for 2019. This participation variability limits the reliability of historical data, particularly for years when less than 50% of service managers participated.

02

Definitions and Consistency: A majority of service managers used the federal definition of chronic homelessness, which is more inclusive than the provincial definition. This contributes to slight variations in the reported data and a potential undercount where provincial definitions were used.

03

Demographic Data and Priority Populations:

- Data on demographics, such as gender and age, was available from 36 service managers in 2024, representing 74% of all service managers. Most service managers reported using consistent age groupings, although minor variations were noted.
- Priority population data was more limited. Refugees and asylum seekers, for instance, were reported by 21 service managers in 2024. Missing data was addressed through desk research or assumptions, such as using zero for earlier years when fewer than 10 people were reported in later years, to avoid overestimating overall rates for Ontario.
- For Indigenous populations, 74% of service managers reported, with significantly lower reporting rates in previous years.

04

Exclusions and Underrepresentation: The estimates capture **known homelessness** only, focusing on people known to the system through service use or enumeration efforts. Estimates do not accurately account for all hidden homelessness (e.g., couch-surfing) or for people in institutional settings, such as hospitals or correctional facilities. Similarly, populations living on reserve are not comprehensively represented, which limits the representation of Indigenous homelessness data.

05

Underreported Demographics: Demographic information, particularly for Indigenous populations, may be underreported due to several factors. These include reliance on observed characteristics, exclusion at the program level, or people choosing not to disclose information due to experiences of systemic racism or mistrust of institutions.

Further methodological details can be found in the Technical Notes section.

Interpreting this Section

Annual Estimates vs. Real-Time Counts

As with the previous section, data in this section reflects annualized estimates of chronic homelessness, capturing the number of people who experienced chronic homelessness at any point during the year; it is not an estimate of how many people are presently experiencing chronic homelessness.

Definition of Chronic Homelessness

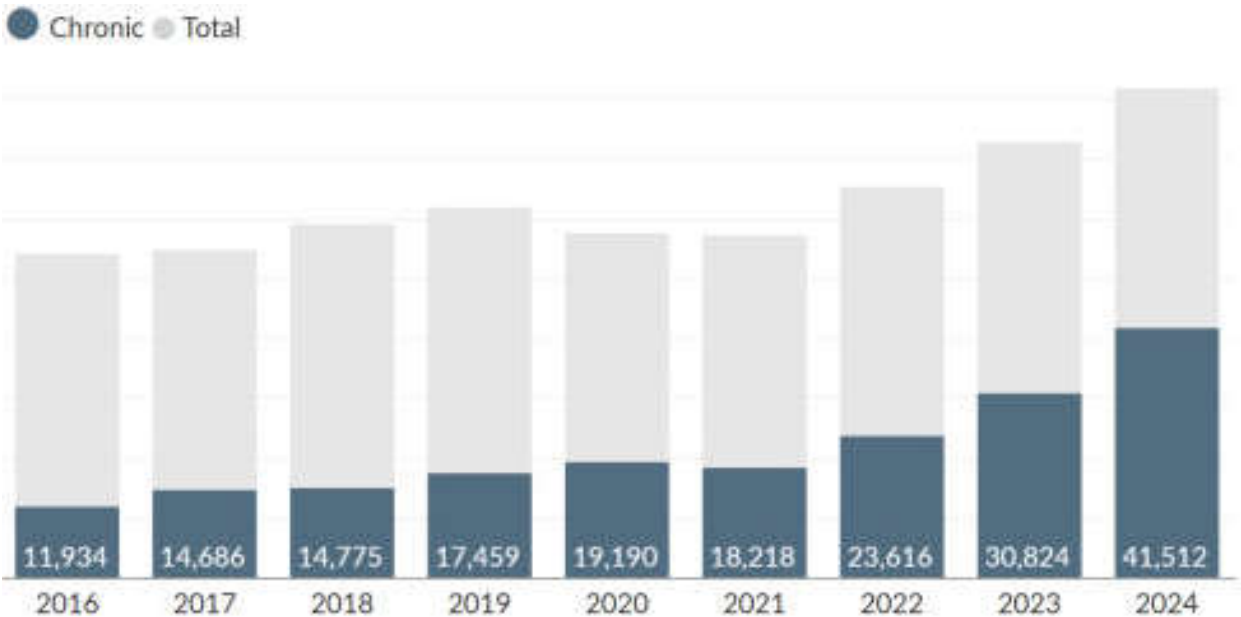
Despite slight variations in the definitions used, chronic homelessness generally refers to situations where people are currently homeless and meet at least one of the following criteria: they have been homeless for a total of at least six months (180 days) over the past year, or they have experienced recurrent homelessness over the past three years, with a cumulative duration of homelessness during that time of at least 18 months.

Findings

Chronic homelessness has nearly doubled since 2021, with 41,512 people affected in 2024

Chronic homelessness has increased significantly since 2016, with both the estimated number of people experiencing it annually and its share of the total homeless population growing. In 2024, an estimated 41,512 people experienced chronic homelessness, marking the first time those experiencing chronic homelessness represented more than half of all known homelessness.

Figure 11: Estimated Number of People Experiencing Chronic Homelessness Compared to Total Population Experiencing Homelessness, Ontario, 2016–2024



Adjusted

Missing values have been filled using additional research or statistical methods.

Table 8: Service Manager (SM) Submission Rates for People Experiencing Chronic Homelessness Compared to Total Population Experiencing Homelessness, Ontario, 2016–2024

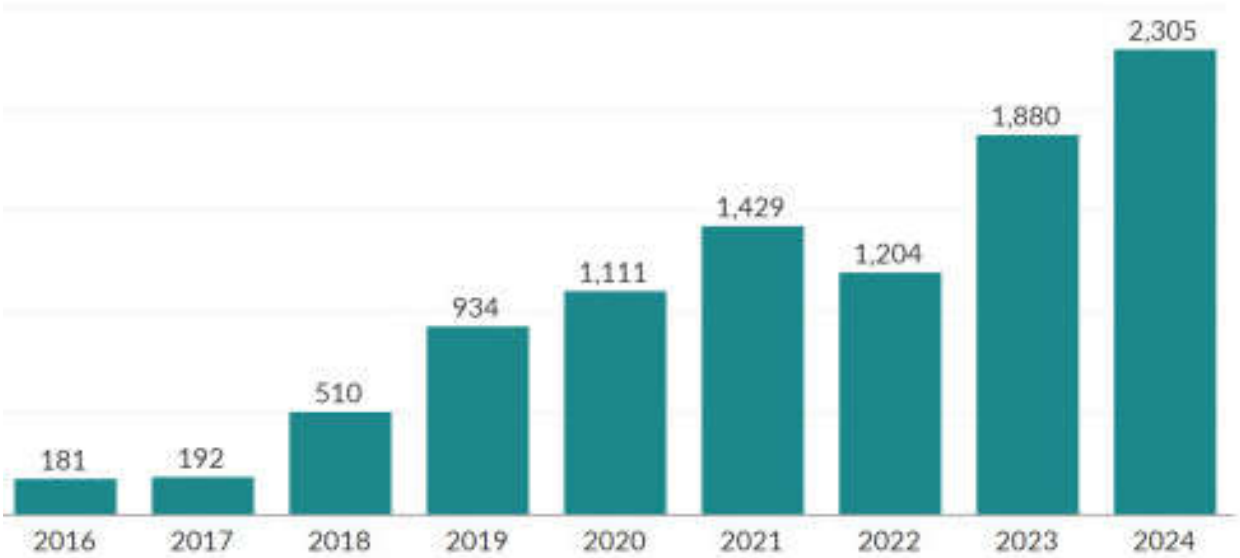
	2016	2017	2018	2019	2020	2021	2022	2023	2024
SM Count	8	8	21	15	21	36	45	46	47
Population %	11%	11%	43%	51%	61%	81%	91%	95%	100%

While the total number of people experiencing homelessness has risen, chronic homelessness as a percentage of the total has grown from 22% in 2016 to 51% in 2024. This suggests that people remain unhoused for longer periods. This also highlights systemic challenges, including gaps in housing infrastructure and a misalignment between the existing continuum of supports and the demand for them. Simply put, there are not enough spaces to meet the needs of people or the spaces that do exist are not the right ones.

Chronic homelessness in northern regions has nearly doubled since 2022

In northern regions, the number of people experiencing chronic homelessness has risen sharply, nearly doubling from 1,204 people in 2022 to an estimated 2,305 in 2024. At the same time, the total number of people experiencing **known homelessness** in these regions grew from 3,615 to 5,377, an increase of 49%.

Figure 12: Estimated Number of People Experiencing Chronic Homelessness in Northern Communities, Ontario, 2016–2024



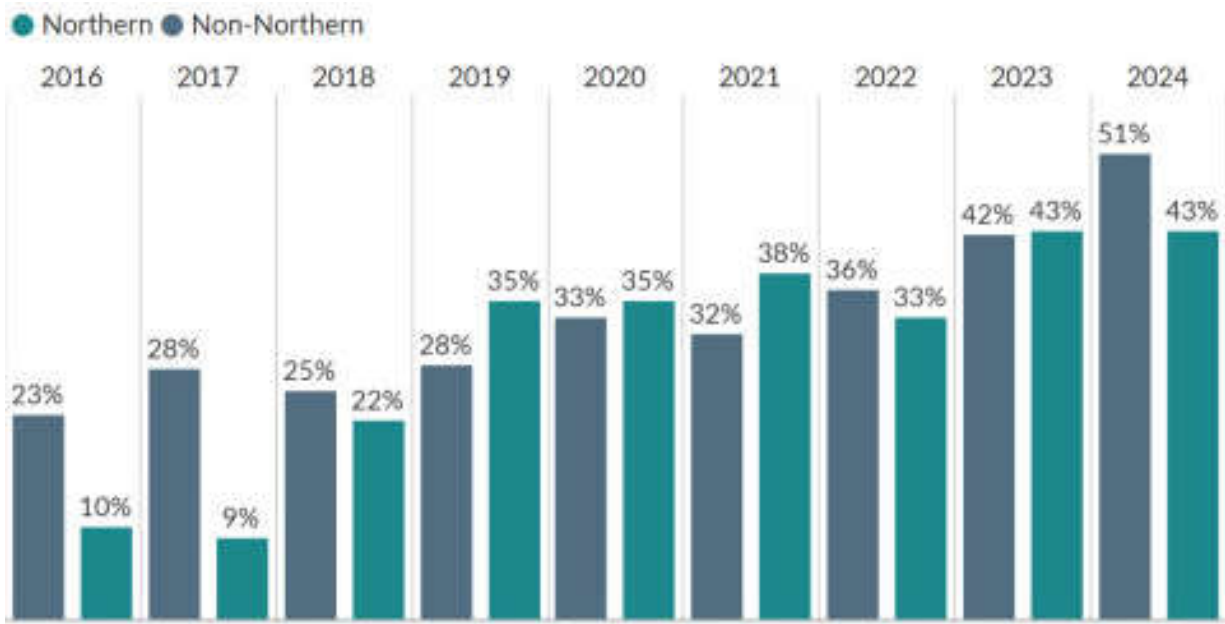
Adjusted
Missing values have been filled using additional research or statistical methods.

Table 9: Service Manager (SM) Submission Rates for People Experiencing Chronic Homelessness in Northern Communities, Ontario, 2016–2024

	2016	2017	2018	2019	2020	2021	2022	2023	2024
SM Count	1	2	5	1	4	8	11	11	11
Population %	5%	10%	33%	5%	33%	72%	100%	100%	100%

That means that while more people overall are becoming homeless in northern regions, chronic homelessness—the number of people experiencing long-term homelessness—is growing even faster. By 2024, chronic homelessness accounted for 43% of all **known homelessness** in the north, up from 33% in 2022. This trend reflects the acute challenges faced by northern communities, where resources and infrastructure to address long-term homelessness are often limited.

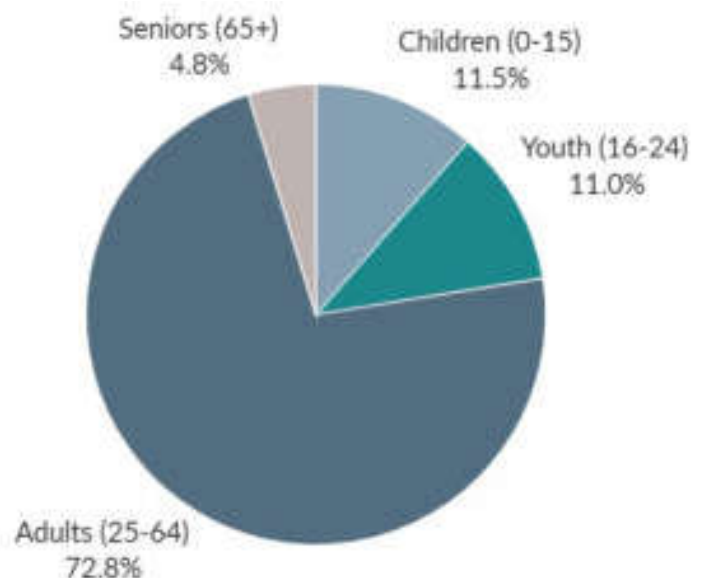
Figure 13: Chronic Homelessness as a Percentage of Total Homelessness, Northern and Non-Northern Communities, Ontario, 2016–2024



Nearly one-quarter of the people experiencing chronic homelessness in Ontario are youth or children

Since 2021, children (aged 0–15) and youth (aged 16–24) have consistently made up approximately 23.0% of Ontario’s known chronic homelessness population. In 2024, children accounted for 11.5% and youth 11.0%. This proportion has remained steady over the past four years, with only minor fluctuations between 22.0% and 24.0%.

Figure 14: Reported Chronic Homelessness by Age Group, Ontario, 202



Unadjusted

Figures are presented as reported, without adjustments for missing values.

Table 10: Service Manager (SM) Submission Rates for Chronic Homelessness by Age Group, Ontario, 2024

SM Count	36
Population %	74%

According to Infrastructure Canada, data from the 2020–2022 Nationally Coordinated Point-in-Time Count⁴ reveals that while children and youth are less likely than adults to experience chronic homelessness, the long-term effects can be devastating. Research shows that people who first experience homelessness as children are significantly more likely to face chronic homelessness later in life: 78% of those who became homeless as children were chronically homeless during the federal count.

Failing to address homelessness among children and youth may not only perpetuate cycles of long-term homelessness, placing increasing strain on the social safety net, but also fracture family structures, destabilize communities, and impose immense burdens on social systems for generations.

Indigenous representation in chronic homelessness data masked by systemic underreporting

According to reported data (38 service managers reporting for 2024, representing 76% of the total population), at least 4,418 Indigenous people were experiencing chronic homelessness in Ontario in 2024, representing 10.6% of the population known to be experiencing chronic homelessness.

While Indigenous people make up 2.9% of Ontario's overall population (2021 Census), they are clearly overrepresented among those experiencing chronic homelessness. However, this figure likely underrepresents the true extent of the issue due to systemic barriers to accurate enumeration. A lack of culturally safe spaces and Indigenous-led crisis supports means many Indigenous people experiencing homelessness may not access services or become known to homelessness systems through data-collection tools like PiT Counts and By-Name Lists. This results in incomplete data, particularly in urban centres, where Indigenous representation in reported data was, for some, below 10%.

Data from service managers reveals notable regional differences. For 2024, the non-weighted average Indigenous representation among chronically homeless populations is 44.6% in northern regions compared to 13.8% in non-northern regions. Four service managers reported that Indigenous representation exceeds 50% of the chronically homeless population in their regions. These disparities point to systemic challenges, including the lack of culturally safe spaces, mistrust of data-collection systems, and the missing data from hidden homelessness and on-reserve populations.

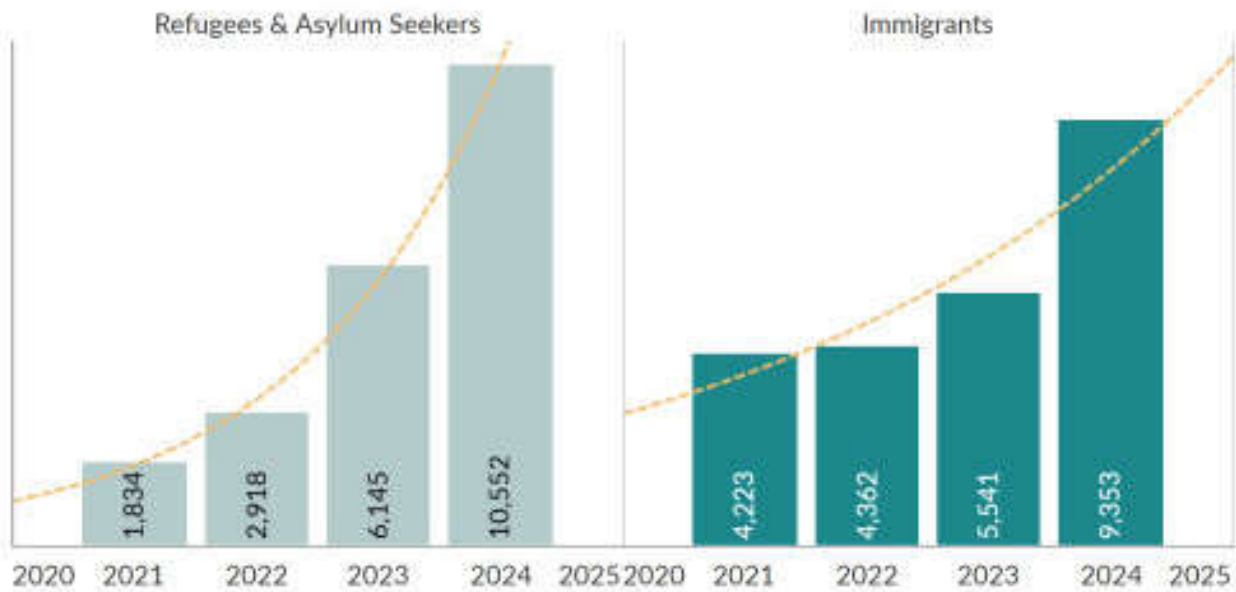
Current definitions of homelessness, rooted in colonial frameworks, fail to align with Indigenous understandings of home, community, and displacement. Colonial-centred definitions and methodologies do not acknowledge key aspects of Indigenous experiences, such as intergenerational trauma, systemic racism, and land dispossession, all of which are central to understanding housing instability in Indigenous communities.

It is our assessment that the data significantly understates the extent of Indigenous chronic homelessness. This report, which reflects data provided by service managers, acknowledges the data's limitations, particularly regarding the known population it represents. Addressing—and even quantifying—Indigenous homelessness is not just about more accurate enumeration: it is about the need to dismantle colonial frameworks and centre Indigenous leadership, sovereignty, and culturally rooted data collection in working toward housing solutions.

Chronic homelessness for refugees grows nearly sixfold in four years

Although the proportion of immigrants in the overall provincial population has not changed in recent years, the number of immigrants, refugees, and asylum seekers enumerated among Ontario's chronic homelessness population has grown significantly. Between 2021 and 2024, the number of chronically homeless refugees and asylum seekers rose from 1,834 to 10,552 (+475.4%), while immigrants experiencing chronic homelessness increased from 4,223 to 9,353 (+121.5%).

Figure 15: Estimated Annual Chronic Homelessness Among Refugees, Asylum Seekers, and Immigrants, Ontario, 2020–2025



Adjusted

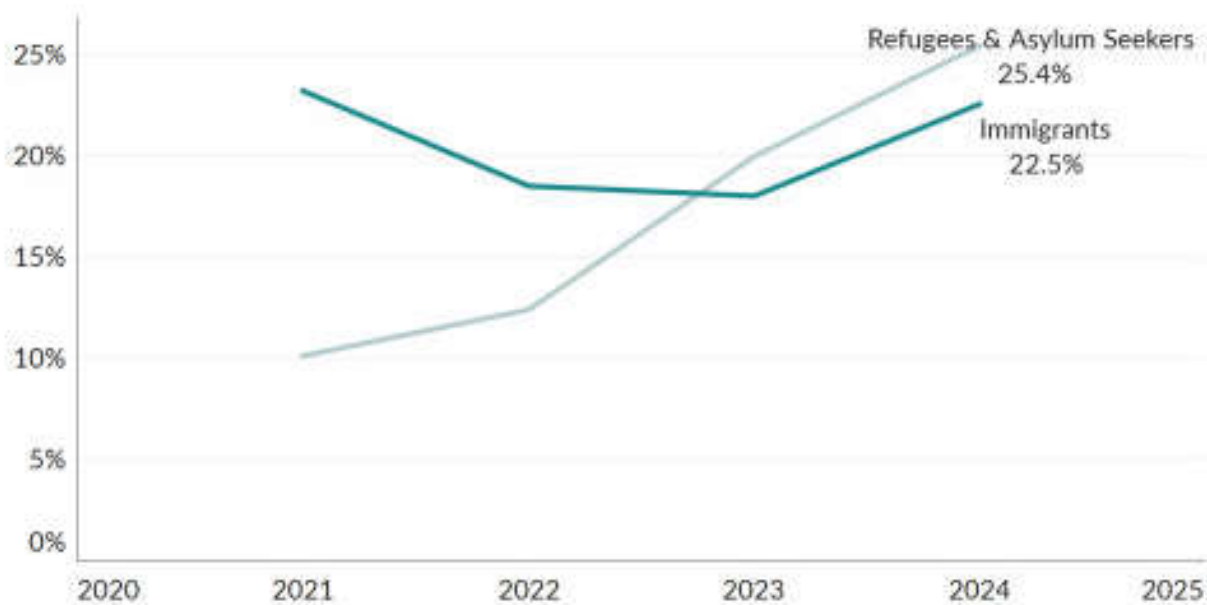
Missing values have been filled using additional research or statistical methods.

Table 11: Service Manager (SM) Submission Rates for Chronic Homelessness Among Refugees, Asylum Seekers, and Immigrants, Ontario, 2020–2025

		2021	2022	2023	2024
Refugees & Asylum Seekers	SM Count	14	16	18	21
	Population %	50%	51%	52%	58%
Immigrants	SM Count	12	15	17	20
	Population %	30%	31%	32%	38%

Historically, refugees and asylum seekers did not remain in unsheltered or sheltered homelessness for prolonged periods, often transitioning quickly to permanent housing solutions. However, the current system has barriers to positive exits, defined as a sustainable and permanent transition out of homelessness into stable housing that meets individual or family needs. These groups are, increasingly, remaining in the homelessness system long enough to meet the threshold for chronic homelessness.

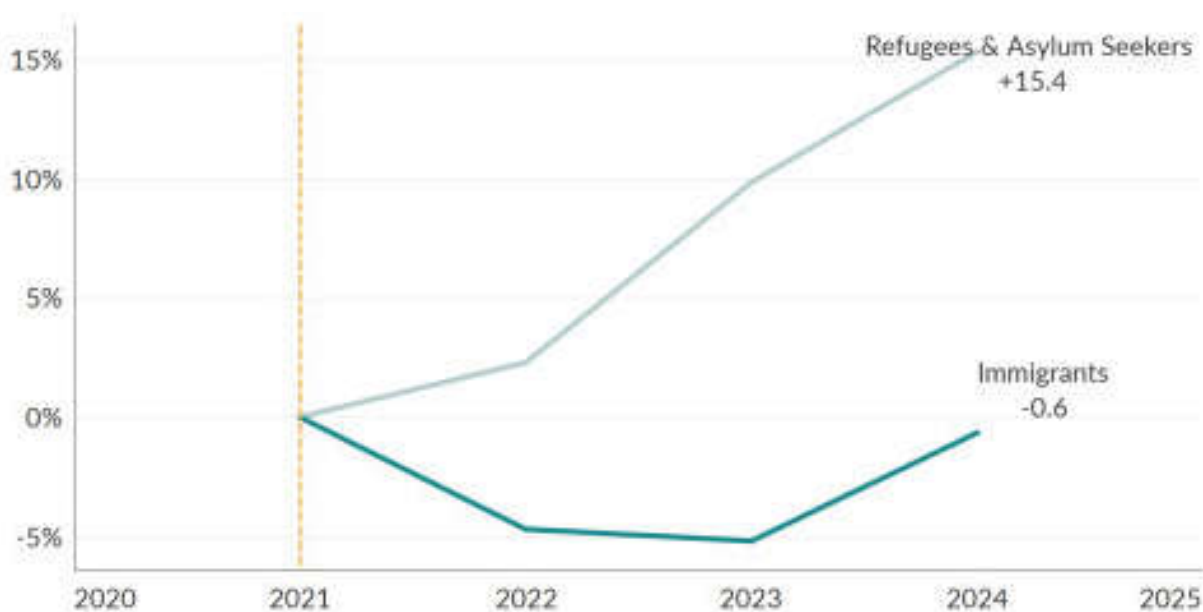
Figure 16: Percent of Total Chronic Homelessness Among Refugees, Asylum Seekers, and Immigrants, Ontario, 2021–2024



Refugees and asylum seekers have had a 15.4 percentage-point increase in their share of Ontario's chronic homelessness population since 2021, while the proportion of immigrants has remained relatively stable, decreasing slightly by 0.6 percentage points.

This growing extent of chronic homelessness in demographics not typically associated with prolonged homelessness highlights a key systemic challenge and represents an important limiting factor in achieving functional zero, a state where homelessness is rare, brief, and non-recurring. Some service managers have made notable progress, with limited resources, in developing diversion initiatives and tailoring programs for refugees and asylum seekers. However, the overall system was not originally designed to provide a long-term crisis response to refugees and asylum seekers. This reality reflects the need to ensure that the social infrastructure is aligned with the evolving profiles and needs of those experiencing homelessness.

Figure 17: Percentage Point Change in Percent of Total Chronic Homelessness from 2021 Among Refugees, Asylum Seekers, and Immigrants, Ontario, 2021–2024



1.4: Homelessness-Serving System

ONTARIO'S HOMELESSNESS-SERVING SYSTEM IS AT A CROSSROADS, CHALLENGED BY INCREASING DEMAND, A SURGE IN CHRONIC HOMELESSNESS, AND AN URGENT NEED TO BALANCE IMMEDIATE CRISIS RESPONSE WITH LONG-TERM SOLUTIONS.

Between 2019 and 2024, bed capacity in emergency shelters grew by an estimated 34%, signaling an unmet need within the crisis response system. Meanwhile, chronic homelessness has tripled since 2016—a clear indication that more people are becoming trapped in homelessness systems designed to provide temporary relief.

Based on data provided by service managers, there were an estimated 27,138 beds across three main support types in 2024: emergency shelters, transitional housing, and supportive housing. These figures do not include Violence Against Women (VAW) shelters, provincially operated shelters, or supportive housing funded through health programs like those provided by the Ministry of Health. Nonetheless, the available data highlights a homelessness-serving system heavily reliant on emergency shelters, which account for 65.2% of total expenditures. In contrast, transitional and supportive housing, which are critical for providing pathways out of homelessness, received only 6.0% and 11.6% of spending, respectively.

These patterns highlight a system facing significant challenges in meeting both immediate and long-term needs. As shown in **Part 3: Investing in Solutions**, ending chronic homelessness to a functional zero level—a dynamic milestone where homelessness becomes rare, brief, and non-recurring—requires that there are appropriate and stable housing options available for people to transition into. However, with chronic homelessness growing as a proportion of total homelessness, more people are becoming stuck inside the system. This is a reflection of the system's current design, which prioritizes crisis response over pathways to permanent stability.

The increasing length of waitlists, as described above, and the growing pressure on the housing system, as described below, combine to add enormous pressure on Ontario's homelessness-serving system.



Chronic Homelessness Has Tripled

A CLEAR INDICATION THAT MORE PEOPLE ARE
BECOMING TRAPPED IN HOMELESSNESS

Methods and Limitations

This analysis focused on the capacity of three key housing types—emergency shelters, transitional housing, and supportive housing—using data reported by service managers. Reporting rates varied across these programs, requiring additional steps to address data gaps and ensure accurate estimates.

PROGRAM CAPACITY

Missing data was supplemented through desk research and manual adjustments using public sources, notes from service managers and standardized methodologies. This approach aimed to provide a more accurate picture of the system's capacity.

To account for non-reporting areas, service managers were asked to estimate the percentage of total system capacity represented by their reported, funded beds. These estimated coverage rates were then applied to extrapolate the capacity for the remainder of the system.

FUNDING EXPENDITURES

Expenditure data was reported directly by service managers and was not adjusted, except in occasional cases when capital expenditures were included to ensure completeness. Some service managers reported program expenditures without specifying associated capacity, such as funding for temporary accommodations like hotel or motel stays. These findings reflect the service manager-provided reported expenditures and address only programs under service manager oversight.

Key Limitations

01

Reporting Gaps: Coverage and reporting rates varied considerably across service managers, leaving some data incomplete or unavailable. In some cases, missing information was filled through estimates, which may not provide a complete picture of actual capacity.

02

Data Exclusions: Certain types of facilities, such as Violence Against Women shelters, were generally excluded from this analysis, though it is possible some may have inadvertently been included in the data provided by service managers.

03

Undercounting of System Capacity: This analysis captures only the portion of the housing system funded and reported by service managers. While service managers oversee and fund a substantial share of the homelessness-serving system, it is not the entire system; hence, the data does not reflect the entire housing system. Expenditures were reported as provided, without adjustments for unreported programs or external funding sources. As a result, the findings offer a robust view of the system's capacity, but may not include all investments made by non-government sources.

Further methodological details can be found in the Technical Notes section.

Interpreting this Section

Discrepancies Between Funding Announcements and Reported Expenditures

Dollar amounts discussed in this section are based on expenditures reported by service managers, with high submission rates across programs in 2024. While publicly available information, such as funding announcements or budgets, may differ from the expenditures reported here, the figures are not adjusted to align with such sources. The figures provided here represent actual spending reported by service managers, as distinct from allocated funding or planned disbursements, which are often subject to differences in timing and reporting.

Cross-Referencing Submitted Data with Publicly Available Data

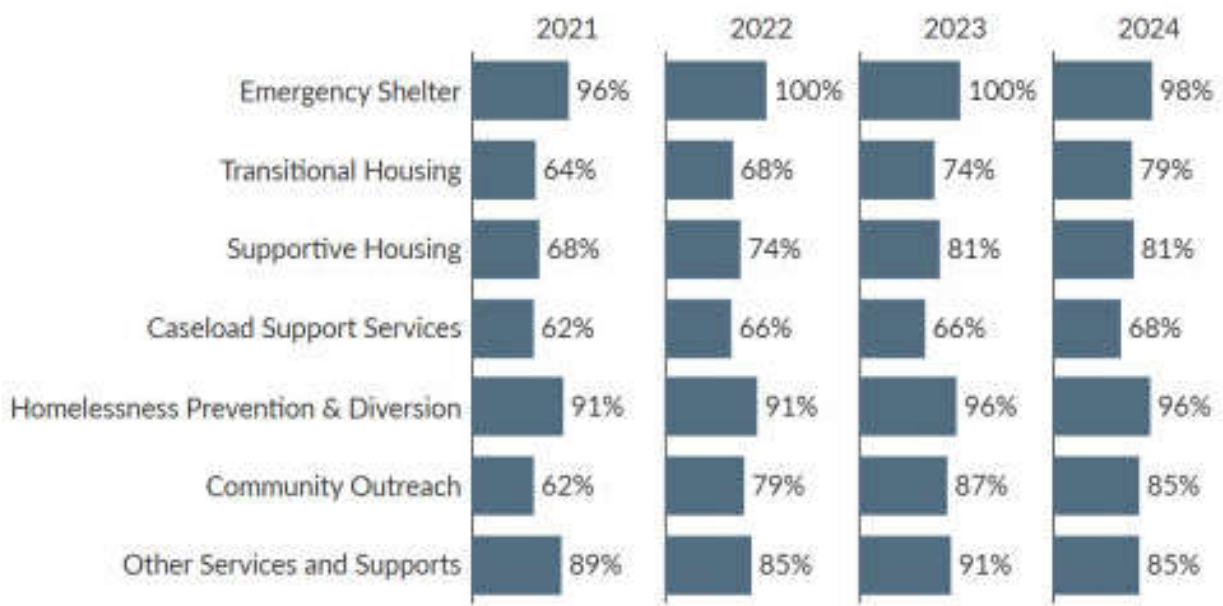
The lack of standardized definitions for program types introduced inconsistencies in reporting, creating a known limitation of this analysis. To facilitate aggregation, service managers were asked to classify programs in the category they thought was the best fit. For example, transitional housing may have been categorized as either emergency shelters or supportive housing in some regions, while one of the larger service managers included supportive housing under rent-geared-to-income (RGI) housing. As such, the submitted figures should not be compared directly with publicly available information, such as funding announcements or locally reported data. The results presented here reflect service manager submissions and are specific to this analysis.

Findings

Homelessness prevention programs have expanded across Ontario, but increases in supportive housing remains slow

This chart shows the percentage of service managers that reported operating specific homelessness programs between 2021 and 2024. The data highlights trends in program availability across Ontario’s homelessness-serving system.

Figure 18: Percentage of Service Managers Operating Specific Homelessness Programs, Ontario, 2021–2024

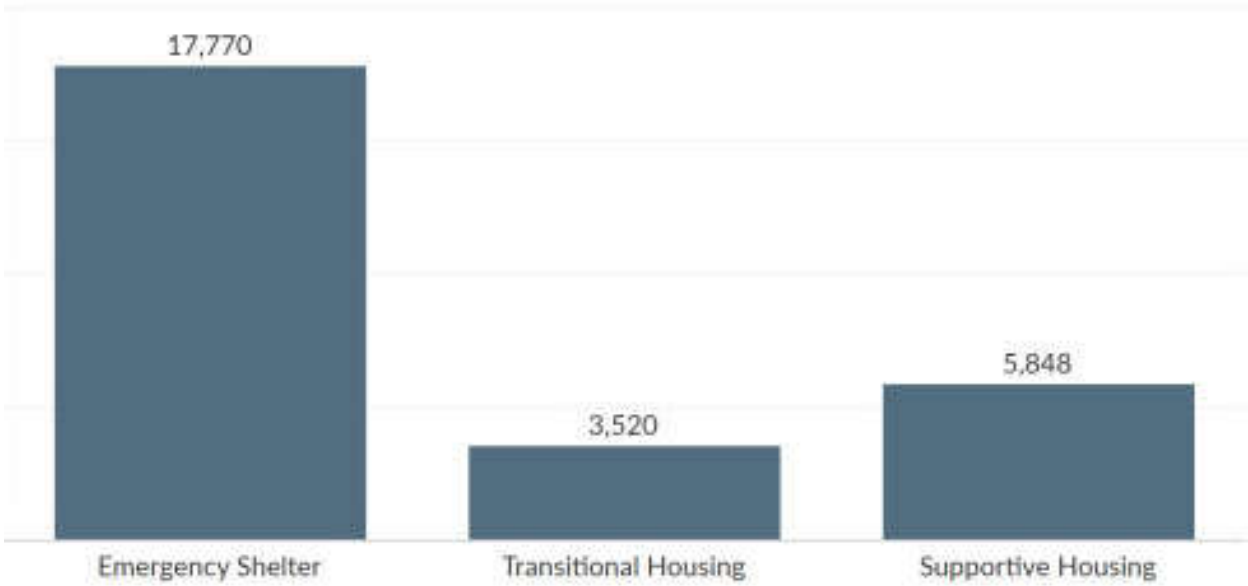


- Nearly all service managers reported emergency shelter programs, reaching 100% of service managers in 2022 and 98% in 2024.
- Transitional housing programs grew steadily, with the number of service managers reporting such programs increasing from 64% in 2021 to 79% in 2024.
- Supportive housing programs also grew, with 68% of service managers reporting these programs in 2021, rising to 81% in both 2023 and 2024.
- Caseload support services remained stable, with coverage increasing slightly from 62% in 2021 to 68% in 2024.
- Homelessness prevention and diversion programs maintained high levels of availability, with 91% of service managers reporting these programs in 2021, increasing to 96% by 2024.
- Community outreach programs grew from 62% in 2021 to 87% in 2023, stabilizing at 85% in 2024.
- Other services and support saw coverage decreasing from 89% in 2021 to 85% in 2024.

In 2024, there was one supportive housing space for every 14 people estimated to be experiencing known homelessness in Ontario

In 2024, Ontario's homelessness-serving system provided an estimated 27,138 beds across three main service types: emergency shelters, transitional housing, and supportive housing. Note that transitional and supportive housing are defined differently, as discussed in detail in the section below. **This estimate does not include supportive housing funded and overseen by the Ministry of Health, which operates outside the homelessness-serving system.**

Figure 19: Estimated Bed Capacity by Homelessness Program Type, Ontario, 2024



Adjusted

Missing values have been filled using additional research or statistical methods.

Table 12: Service Manager (SM) Submission Rates Estimated Bed Capacity by Homelessness Program Type, Ontario, 2024

	Emergency Shelters	Transitional Housing	Supportive Housing
SM Count	42	36	36
Population %	97%	74%	73%

EMERGENCY SHELTERS

Emergency shelters formed the largest part of the system, with an estimated total of **17,770 beds** across all 47 service managers. This estimate was based on data reported by 42 service managers, with the remaining data supplemented through desk research and manual adjustments, such as using 2023 data to fill gaps for 2024. This category includes permanent shelter beds, cold-weather shelters, temporary crisis shelters, overflow accommodations, and hotel/motel beds.

TRANSITIONAL HOUSING

Transitional housing accounted for an estimated total of **3,520 beds** across all 47 service managers. This figure was based on data reported by 36 service managers, with gaps addressed through additional analysis, such as reallocating beds that were grouped under other categories. These facilities provide temporary, time-limited support for people transitioning toward permanent housing.

SUPPORTIVE HOUSING

Supportive housing accounted for an estimated total of **5,848 beds** across all 47 service managers. This figure was based on data reported by 36 service managers, with estimates adjusted using a median system coverage rate of 80%, and further research applied to refine totals. This housing type combines permanent accommodations with individualized support services tailored to people with higher needs.

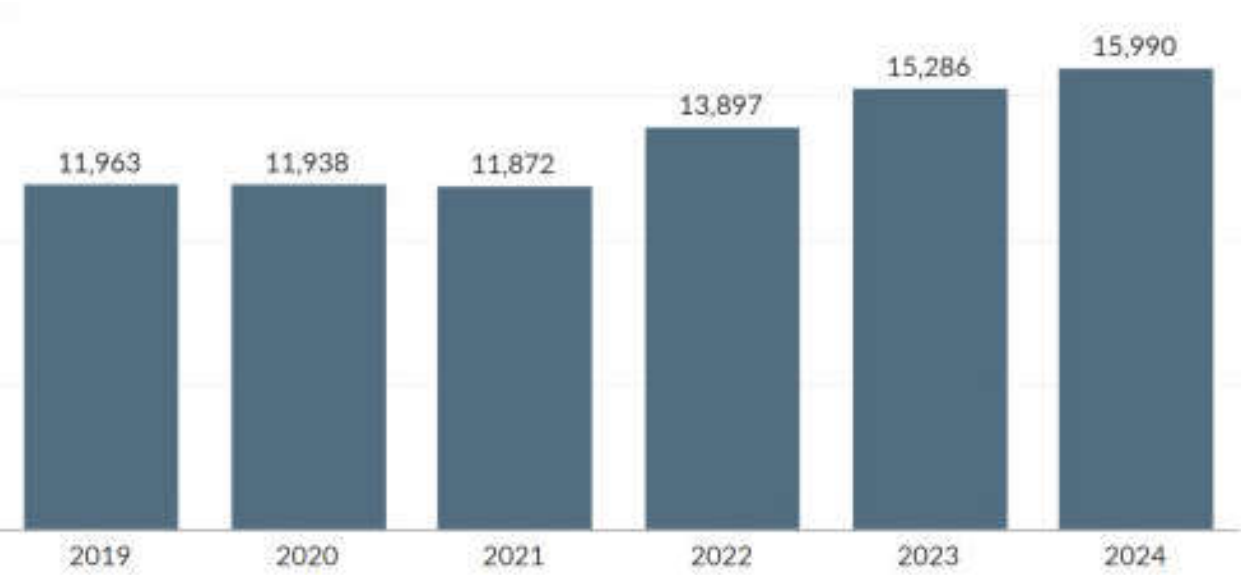
While these figures demonstrate the scale of Ontario's homelessness-serving system, they reflect primarily capacity funded by service managers. And though service managers deliver and fund most of the system, manual adjustments only partially account for housing and services outside their scope. As a result, the totals do not capture the full extent of Ontario's housing system.



Ontario's homelessness system has
34% shelter growth, yet chronic
homelessness grows by 138%

Between 2019 and 2024, Ontario’s emergency shelter bed capacity increased by 34%, reflecting significant efforts to expand resources and address the rising need for crisis response across the province. The most notable growth occurred after 2021, when the demand for emergency shelters surged, prompting investments in shelter capacity to meet the growing pressures.

Figure 20: Reported Emergency Shelter Bed Capacity (Funded by Service Managers), Permanent and Temporary, Ontario, 2019–2024



Unadjusted
Figures are presented as reported, without adjustments for missing values.

Table 13: Submission Rates by Service Manager (SM) for Emergency Shelter Bed Capacity (Funded by Service Managers), Permanent and Temporary, Ontario, 2019–2024

	2019	2020	2021	2022	2023	2024
SM Count	29	34	38	40	43	42
Population %	62%	75%	93%	95%	98%	97%

During the same period, the total number of people experiencing homelessness grew by 32%, while chronic homelessness rose by 138%, highlighting a troubling shift toward deeper, more persistent housing instability. This increase in chronic homelessness shows that more people are becoming trapped in the homelessness system, unable to transition out of emergency shelters and into stable housing.

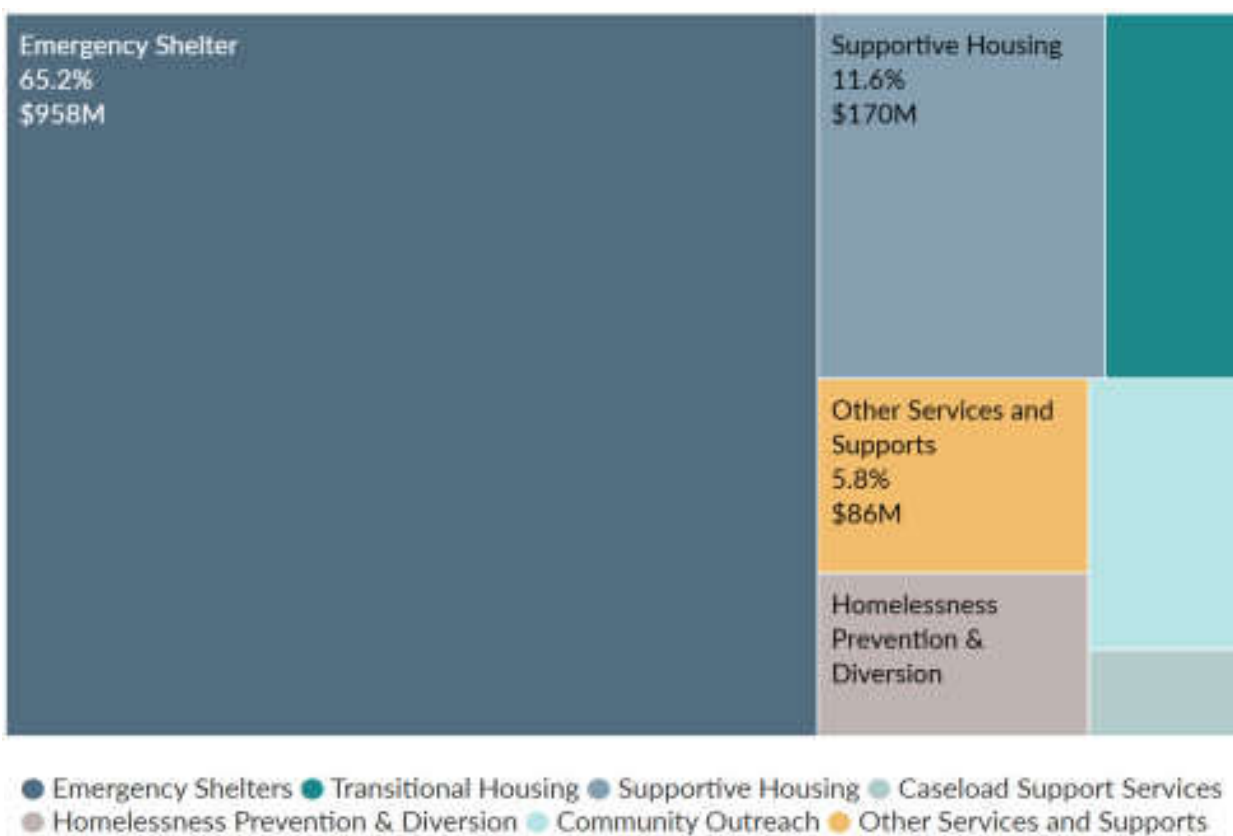
These trends reveal mounting pressures on Ontario's homelessness-serving system. While emergency-shelter capacity continues to expand to meet growing demand, the growing prevalence of chronic homelessness underscores the urgent need for long-term solutions beyond crisis response.

Spending reflects reliance on emergency shelters over prevention

The spending distribution across Ontario's homelessness programs reflects the emphasis on crisis response in the system. Emergency shelters, which make up the largest portion of the system's bed capacity, also dominate funding, accounting for 65.2% of the total \$1.47 billion spent in 2024. In contrast, transitional and supportive housing—essential for moving people out of shelters and into stable housing—received 6.0% and 11.6% of spending, respectively.

This highlights the system's heavy reliance on emergency shelters to address immediate needs, while investments in longer-term solutions like supportive and transitional housing remain comparatively limited.

Figure 21: Reported Allocation of Spending on Homelessness Programs by Program Type, Ontario, 2024



Unadjusted

Figures are presented as reported, without adjustments for missing values.

Table 14: Service Manager (SM) Submission Rates for Allocation of Spending on Homelessness Programs by Program Type, Ontario, 2024

	Emergency Shelter	Transitional Housing	Supportive Housing	Caseload Support Services	Prevention & Diversion	Community Outreach	Other Services and Supports
SM Count	40	22	36	22	38	34	34
Population %	93%	59%	72%	53%	62%	79%	79%

- Emergency shelters accounted for 65.2% of total expenditures, with approximately \$957.7 million on emergency shelters in 2024, and an average expenditure of \$23.9 million.
- Supportive housing represented the second-largest area of spending at 11.6%, totalling \$170.4 million. The average expenditure reported per service manager was \$4.7 million, reflecting the increasing emphasis on providing long-term stable housing with individualized support for people who have complex needs. A portion of these expenditures is embedded in rent-geared-to-income (RGI) housing due to classification practices by a larger service manager.
- Other services and supports made up 5.8% of total expenditures, amounting to \$86 million, with an average expenditure of \$2.5 million.
- Homelessness prevention and diversion programs accounted for 4.9% of expenditures, totalling \$71.8 million, with an average of \$1.89 million.
- Transitional housing expenditures reached \$87.8 million, or 6.0% of total spending, with an average expenditure of \$3.99 million.
- Caseload support services represented 1.6% of expenditures, amounting to \$23.3 million, with an average of \$1.06 million.
- Community outreach programs also accounted for 4.9% of expenditures, equating to \$71.8 million, with an average expenditure of \$2.11 million.



Table 15: Homelessness Program Spending by Program Type, Ontario, 2020–2024

		2020	2021	2022	2023	2024
Emergency Shelter	Expenditures	612.2M	750.8M	820.1M	966.5M	957.7M
	% of Total	63.5%	62.2%	64.2%	66.7%	65.2%
	SM Average	16,111K	18,771K	19,073K	21,478K	23,943K
	SM Count	38	40	43	45	40
	Population %	83%	86%	87%	95%	93%
Transitional Housing	Expenditures	42.9M	64.6M	80.9M	90.0M	87.8M
	% of Total	4.4%	5.4%	6.3%	6.2%	6.0%
	SM Average	2,384K	2,810K	3,677K	3,599K	3,989K
	SM Count	18	23	22	25	22
	Population %	60%	66%	52%	70%	59%
Supportive Housing	Expenditures	76.4M	147.4M	163.5M	144.4M	170.4M
	% of Total	7.9%	12.2%	12.8%	10.0%	11.6%
	SM Average	2,635K	4,912K	4,673K	3,904K	4,734K
	SM Count	29	30	35	37	36
	Population %	59%	61%	65%	73%	72%
Caseload Support Services	Expenditures	23.5M	26.4M	19.8M	22.8M	23.3M
	% of Total	2.4%	2.2%	1.6%	1.6%	1.6%
	SM Average	1,069K	1,054K	861K	948K	1,061K
	SM Count	22	25	23	24	22
	Population %	58%	61%	57%	64%	53%
Prevention & Diversion	Expenditures	46.3M	68.3M	83.7M	81.0M	71.8M
	% of Total	4.8%	5.7%	6.6%	5.6%	4.9%
	SM Average	1,218K	1,665K	2,092K	1,928K	1,891K
	SM Count	38	41	40	42	38
	Population %	64%	67%	63%	71%	62%
Community Outreach	Expenditures	18.9M	23.4M	35.7M	60.5M	71.8M
	% of Total	2.0%	1.9%	2.8%	4.2%	4.9%
	SM Average	860K	938K	1,021K	1,552K	2,110K
	SM Count	22	25	35	39	34
	Population %	56%	59%	82%	91%	79%
Other Services and Supports	Expenditures	144.2M	126.5M	72.9M	83.3M	85.7M
	% of Total	14.9%	10.5%	5.7%	5.8%	5.8%
	SM Average	4,005K	3,163K	1,823K	2,083K	2,520K
	SM Count	36	40	40	40	34
	Population %	82%	86%	85%	92%	79%
Total	Expenditures	964.4M	1,207.4M	1,276.7M	1,448.5M	1,468.5M
	% of Total	100.0%	100.0%	100.0%	100.0%	100.0%
	SM Average	4,751K	5,390K	5,364K	5,748K	6,498K
	SM Count	41	43	44	46	44
	Population %	84%	87%	88%	96%	95%

Definition differences obscure capacity and system performance

TRANSITIONAL AND SUPPORTIVE HOUSING ARE ESSENTIAL COMPONENTS OF ONTARIO'S HOMELESSNESS-SERVING SYSTEM, BUT BOTH FACE SIGNIFICANT INCONSISTENCIES IN DEFINITION AND OPERATIONS THAT OBSCURE THEIR ROLES AND EFFECTS.

Transitional housing is intended to provide temporary, time-limited accommodations with support services to help people move toward permanent housing. However, there is no standardized definition of transitional housing across the province. Some models resemble permanent housing with formal leases and tenancy rights, while others impose stricter timelines and programming requirements, with stays ranging from a few months to several years. These variations made it difficult to capture the true scale or function of transitional housing in the system, and complicated data collection and reporting, despite considerable efforts by service managers.

Supportive housing also lacks a universally accepted definition. Generally considered as permanent housing paired with individualized support services, its implementation varies widely across Ontario. Differences in tenancy arrangements, the intensity and type of support provided, and the populations served all contribute to an inconsistent understanding of supportive housing. Operational models range from nonprofit organizations to housing corporations to municipal partnerships. This project focused on supportive housing and associated capital and operational costs based on data collected from service managers. Supportive housing funded by the Ministry of Health and other health-related supportive housing programs were not included, but it is precisely this complexity that makes fully quantifying supportive housing across the system so challenging.

FEEDBACK FROM SERVICE MANAGERS INDICATES A CHANGE IN THE ROLE OF SUPPORTIVE HOUSING. HISTORICALLY DESIGNED TO MEET THE NEEDS OF PEOPLE WITH COMPLEX AND HIGH-ACUITY CHALLENGES, SUCH AS SEVERE MENTAL-HEALTH ISSUES OR SUBSTANCE-USE DISORDERS, MANY SUPPORTIVE HOUSING UNITS NOW SERVE CLIENTS WITH LOWER-ACUITY NEEDS.

As a result, there has been a shift—either explicitly, through eligibility criteria, or informally in practice—toward serving people with less complex needs.

While imposing rigid models that disregard local definitions and regional variability is not desirable, the looseness of current approaches has turned transitional and supportive housing into broad categories used to describe a wide range of programs with vastly different structures, goals, and service populations. This ambiguity makes it challenging to assess the system's true capacity, evaluate its effectiveness, and determine whether these models are fulfilling their intended roles in addressing homelessness. It also limits the ability to measure their success in achieving goals such as facilitating transitions to permanent housing or supporting people with complex needs.

1.5: Housing System

ONTARIO'S HOUSING SERVICES ARE A CRITICAL PART OF THE BROADER STRATEGY TO ADDRESS HOUSING INSTABILITY AND HOMELESSNESS. THESE PROGRAMS AIM TO PROVIDE AFFORDABLE OPTIONS, CREATE PATHWAYS TO HOUSING STABILITY, AND PREVENT INDIVIDUALS AND FAMILIES FROM FALLING INTO HOMELESSNESS.

Between 2021 and 2024, key housing programs, including rent-geared-to-income (RGI) housing, affordable housing, rent supplements, and transitional and supportive housing, were widely available across most service managers. However, as demand for housing grows, the gap between need and supply is increasingly evident.

While community housing and affordable housing units have shown modest growth, Ontario's RGI housing stock is at capacity, with the waitlist exceeding the total number of available units. This strain on supply limits the system's ability to provide positive exits for people experiencing homelessness, and puts further pressure on high-cost emergency responses, such as shelter systems and transitional housing.

In 2024, service managers reported over \$2.32 billion in housing-program expenditures, with the majority allocated to RGI housing. While this spending demonstrates the central role of RGI housing in supporting low-income households, gaps remain in prevention-focused investments and long-term solutions, both essential to reducing inflow into homelessness and achieving sustainable housing outcomes.

Methods and Limitations

The methods and limitations in this section of the report are largely the same as those outlined in the previous section, with the data collection and analysis processes consistent for both. These figures are based on expenditures reported by service managers, with high submission rates across programs in 2024. However, this data was not reconciled with publicly available information, such as funding announcements or budgets. As a result, discrepancies between allocations to funding and reported expenditures may exist, reflecting differences in timing and reporting for funding commitments, disbursements, and actual spending.

Further methodological details can be found in the Technical Notes section.



Interpreting this Section

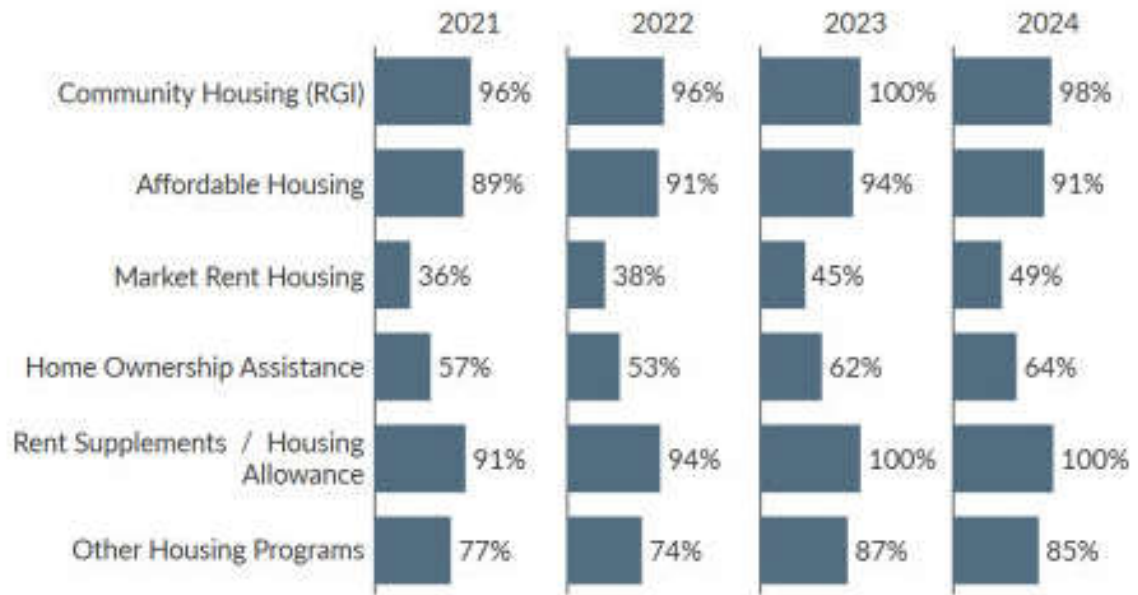
Discrepancies Between Funding Announcements and Reported Expenditures

As explained in “Interpreting This Section” on page 63 in Section 1.4: Homelessness-Serving System, the figures provided in this section represent expenditures reported by service managers; these differ from funding announcements or budgets. Announcements often reflect allocated or planned expenses, while service managers report actual spending, making direct comparisons inaccurate.

Findings

Ontario service managers expand housing programs, with universal access to rent supplements by 2024

Figure 22: Percentage of Service Managers Operating Housing Programs by Program Type, Ontario, 2021 – 2024



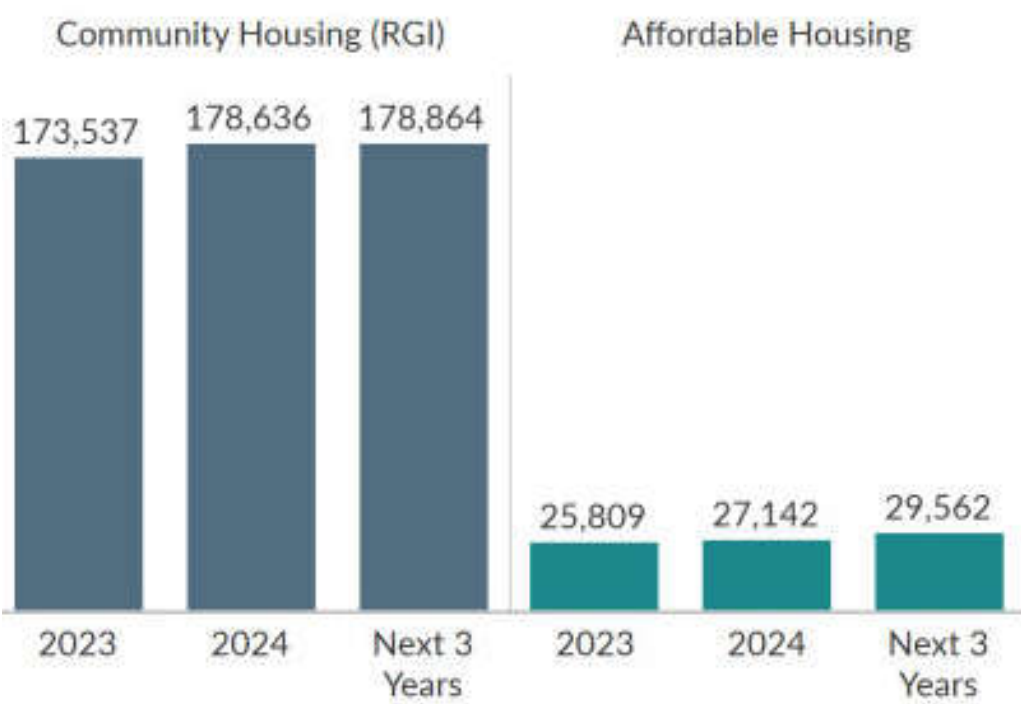
Between 2021 and 2024, service managers reported consistently high levels of availability for key housing programs in Ontario. Rent-geared-to-income (RGI) housing was reported by 98% of service managers in 2024. Affordable housing programs were also widely reported, with 91% of service managers including these.

Rent supplements and housing allowances achieved universal reporting (100%) by 2024, reflecting their central role in Ontario's housing strategy. Homeownership assistance programs were less commonly reported, but saw a steady increase, from 57% in 2021 to 64% in 2024.

Community housing and affordable housing units see modest growth, with significant expansions planned

Service managers reported 178,636 units of community housing (rent-geared-to-income, RGI) and 27,142 units of affordable housing in 2024. These figures remained largely the same as in 2023, with minor variations due to differences in reporting across years. The stability in numbers demonstrates the limited progress made in addressing Ontario's housing needs.

Figure 23: Reported Housing Program Units by Program Type, Ontario, 2023–Next 3 Years



Unadjusted
Figures are presented as reported, without adjustments for missing values.

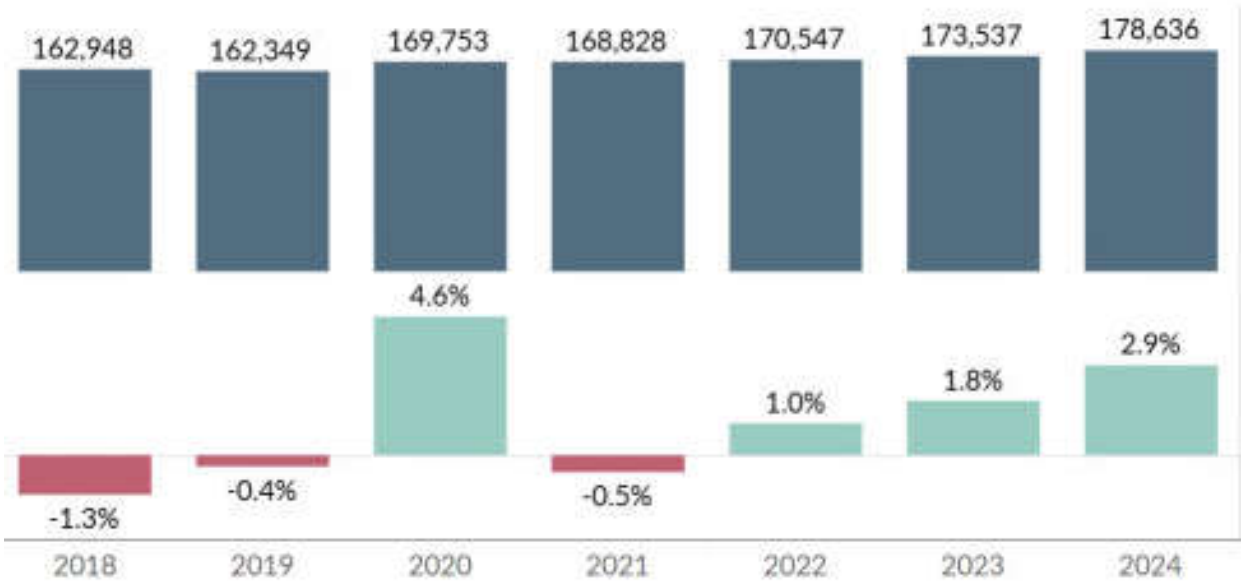
Table 16: Service Manager (SM) Submission Rates for Housing Program Units by Program Type, Ontario, 2023–Next 3 Years

		2023	2024	Next 3 Years
Community Housing (RGI)	SM Count	45	46	33
	Population %	99%	100%	46%
Affordable Housing	SM Count	43	44	31
	Population %	98%	99%	39%

Ontario’s RGI housing supply has very few vacancies, while the waitlist surpasses total available units and continues to grow slightly

Community housing (rent-geared-to-income, RGI) units in Ontario have remained largely the same in recent years. While the data shows 178,636 units in 2024, any apparent changes are largely attributable to variations in reporting rates rather than significant growth.

Figure 24: Reported Community Housing (RGI) Units and Annual Percentage Change, Ontario, 2018–2024



Unadjusted

Figures are presented as reported, without adjustments for missing values.

Table 17: Submission Rates by Service Manager (SM) for Community Housing (RGI) Units and Annual Percentage Change, Ontario, 2018–2024

	2018	2019	2020	2021	2022	2023	2024
SM Count	40	40	43	43	43	45	46
Population %	90%	90%	97%	97%	97%	99%	100%

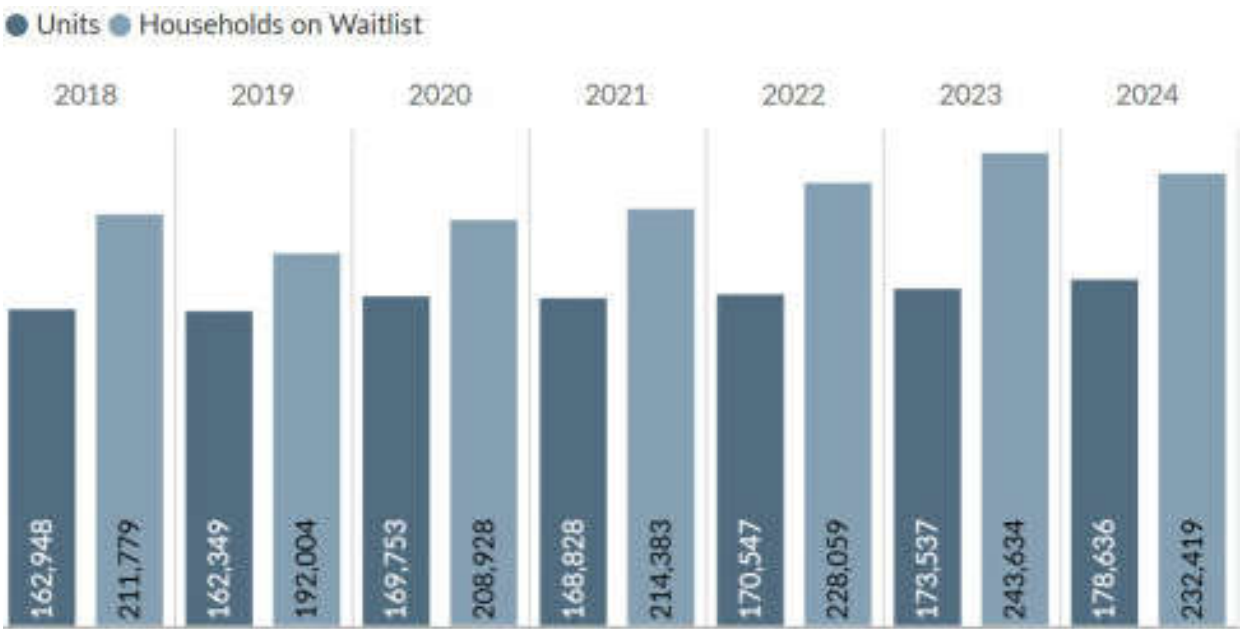
Ontario’s RGI housing system is essentially full, with an estimated waitlist of 268,241 households in 2024. This figure is adjusted from the 232,419 households reported by 43 service managers.

Adjusted

Missing values have been filled using additional research or statistical methods.

This waitlist includes people who are at various stages of housing precarity, from those struggling to maintain stable housing to those experiencing homelessness. The lack of available RGI units limits the system’s ability to create positive exits for people experiencing homelessness, and reduces options for being able to house people transitioning out of the homelessness system.

Figure 25: Reported Community Housing (RGI) Units and Households on Waitlist, Ontario, 2018–2024



Unadjusted
Figures are presented as reported, without adjustments for missing values.

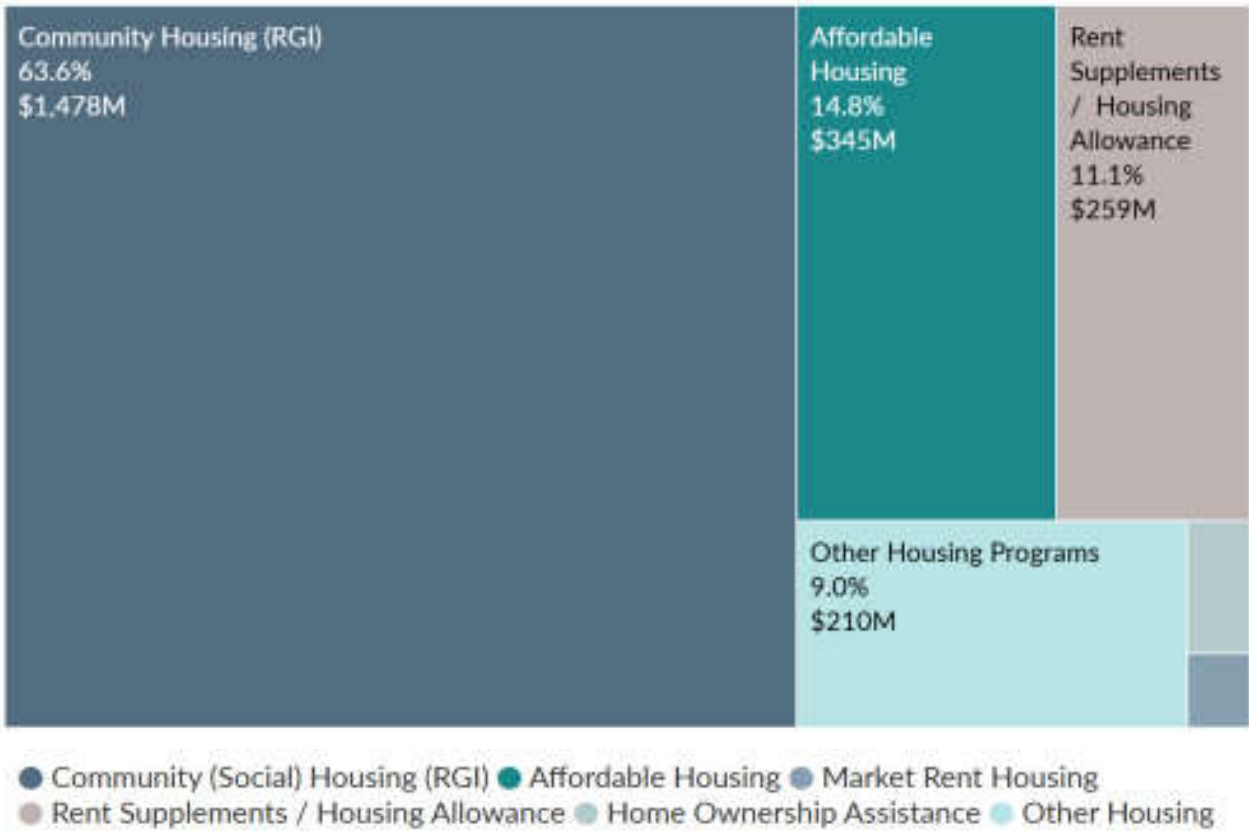
The reliance on an overburdened RGI system exacerbates the problem, as people who are unable to access RGI housing units are more likely to remain in the homelessness system or to require more expensive housing supports, such as emergency shelters or transitional housing. With average rents far exceeding the shelter rates provided by Ontario Works (OW) and Ontario Disability Support Program (ODSP) payments, the availability of RGI and affordable housing is essential to achieving an end to chronic homelessness.

The imbalance between supply and demand, coupled with rising affordability pressures, signals not just an ongoing stress on the RGI system, but also significant inflow into homelessness systems. Without additional capacity to absorb new demand, Ontario’s housing system faces a critical risk of instability.

Community housing drives spending, but unmet demand and fewer prevention expenditures risk stress on the system

In 2024, service managers reported total housing program expenditures of \$2.32 billion, with 63.6% (\$1.48 billion) allocated to community housing (rent-geared-to-income, RGI), reflecting the dominant role of RGI housing in addressing affordability challenges and supporting low-income households.

Figure 26: Reported Total Housing Program Expenditures by Program Type, Ontario, 2024



Unadjusted

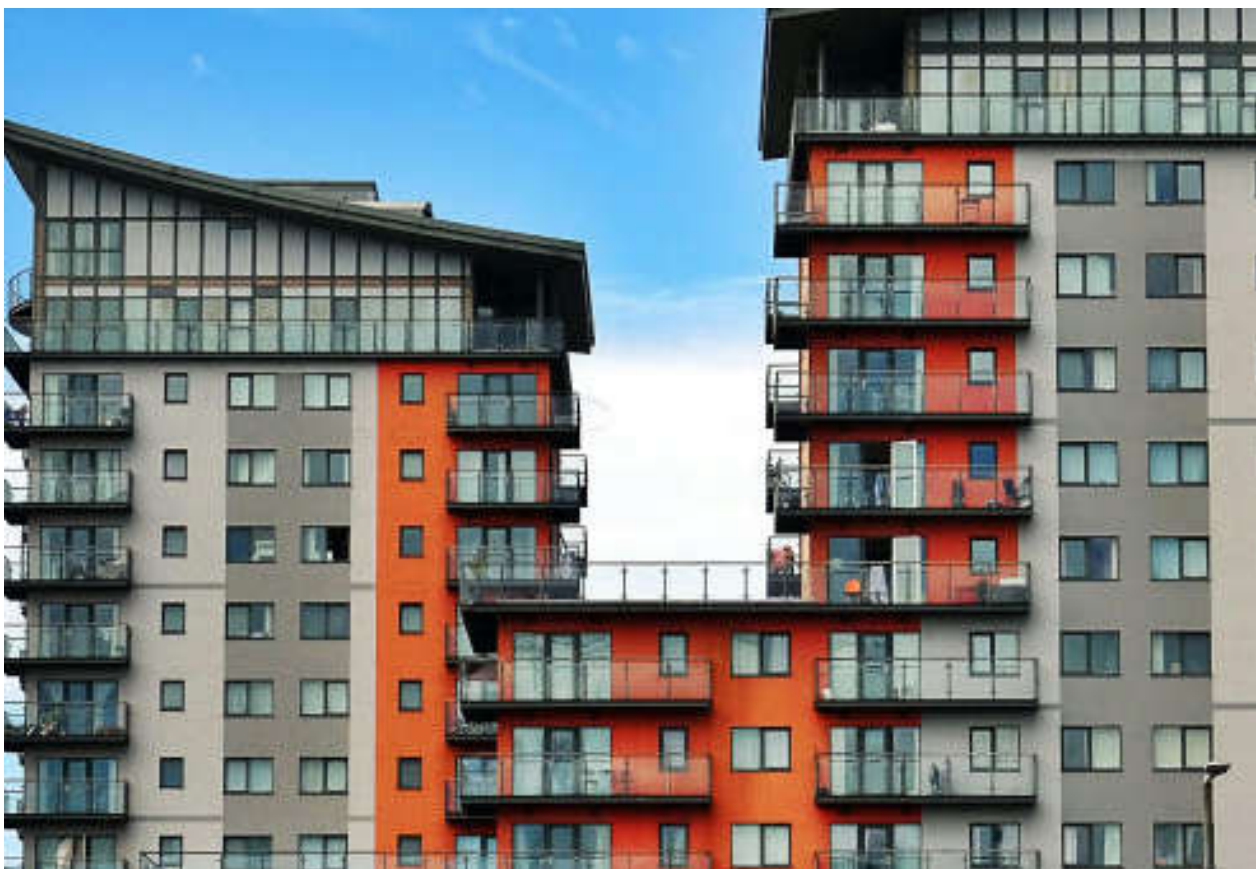
Figures are presented as reported, without adjustments for missing values.

Table 18: Service Manager (SM) Submission Rates for Allocation of Total Housing Program Expenditures by Program Type, Ontario, 2024

	Community Housing (RGI)	Affordable Housing	Market Rent Housing	Home Ownership Assistance	Rent Supplements / Housing Allow..	Other Housing Programs
SM Count	39	32	17	23	39	31
Population %	96%	89%	26%	50%	87%	72%

Affordable housing programs accounted for 14.8% of expenditures (\$345 million), while rent supplements and housing allowances represented 11.1% (\$259 million). Other housing programs made up 9.0% of spending (\$210 million). The smallest portions of reported funding were allocated to market-rent housing (0.5%) and homeownership assistance (0.9%).

In contrast, service managers reported \$957.7 million in emergency-shelter expenditures in 2024. Crisis response remains critically important and should not be viewed as a zero-sum game against other forms of housing investments. However, the scale of spending on emergency shelters—especially since many communities lack access to shelter beds at all—raises questions about whether current allocations meet the system's broader goals. Balancing immediate crisis needs with long-term solutions is important to reduce reliance on high-cost interventions and address the systemic roots of housing instability.



As noted previously, rent-geared-to-income housing is essential to the effective functioning of the homelessness system, but demand far outstrips supply. This imbalance significantly affects both inflow into homelessness and the ability to create positive exits out of homelessness. Additionally, without sufficient investment in prevention strategies—which are generally lower-cost interventions—both system costs and homelessness rates will continue to escalate. These challenges are explored in greater detail in **Part 3: Investing in Solutions**.

Table 19: Housing Program Spending by Program Type, Ontario, 2020–2024

		2020	2021	2022	2023	2024
Community Housing (RGI)	Expenditures	693.4M	1,201.3M	1,290.6M	1,456.7M	1,477.8M
	% of Total	68.2%	73.0%	72.1%	63.0%	63.6%
	SM Average	17,779K	28,602K	31,478K	33,106K	37,893K
	SM Count	39	42	41	44	39
	Population %	74%	97%	96%	99%	96%
Affordable Housing	Expenditures	145.7M	175.5M	144.1M	372.0M	344.8M
	% of Total	14.3%	10.7%	8.1%	16.1%	14.8%
	SM Average	5,024K	5,662K	4,650K	10,627K	10,773K
	SM Count	29	31	31	35	32
	Population %	57%	81%	81%	94%	89%
Market Rent Housing	Expenditures	6.6M	9.4M	8.9M	11.4M	12.2M
	% of Total	0.7%	0.6%	0.5%	0.5%	0.5%
	SM Average	473K	585K	526K	631K	719K
	SM Count	14	16	17	18	17
	Population %	23%	25%	26%	27%	26%
Home Ownership Assistance	Expenditures	3.0M	2.4M	3.7M	13.9M	21.5M
	% of Total	0.3%	0.1%	0.2%	0.6%	0.9%
	SM Average	160K	106K	174K	556K	935K
	SM Count	19	23	21	25	23
	Population %	23%	27%	26%	58%	50%
Rent Supplements / Housing Allowance	Expenditures	97.7M	163.7M	164.9M	218.8M	258.7M
	% of Total	9.6%	10.0%	9.2%	9.5%	11.1%
	SM Average	2,642K	4,094K	4,023K	4,974K	6,634K
	SM Count	37	40	41	44	39
	Population %	63%	86%	86%	99%	87%
Other Housing Programs	Expenditures	69.7M	92.7M	178.0M	240.0M	209.9M
	% of Total	6.9%	5.6%	9.9%	10.4%	9.0%
	SM Average	2,323K	2,810K	5,564K	6,486K	6,771K
	SM Count	30	33	32	37	31
	Population %	49%	72%	71%	85%	72%
Total	Expenditures	1,016.2M	1,645.1M	1,790.3M	2,312.7M	2,324.9M
	% of Total	100.0%	100.0%	100.0%	100.0%	100.0%
	SM Average	6,049K	8,892K	9,783K	11,393K	12,845K
	SM Count	40	43	43	45	42
	Population %	74%	97%	97%	99%	97%

1.6: Housing and Homelessness Funding

BETWEEN 2016 AND 2024, THE ESTIMATED FUNDING FOR HOUSING AND HOMELESSNESS MORE THAN DOUBLED, INCREASING FROM

\$1.9 BILLION TO \$4.1 BILLION.

This growth highlights a heightened recognition of the urgent need to address housing instability and homelessness across the province. However, the data also shows a significant shift in financial responsibility, with municipalities increasingly shouldering a larger share of costs, particularly for housing programs.

With Ontario's goal of ending chronic homelessness by 2030, these trends raise critical questions about the funding mix and allocation strategies that will be most effective in achieving the target. While federal investments in homelessness funding have increased significantly in recent years, municipalities remain the cornerstone of housing funding in Ontario, accounting for over 65% of housing expenditures by 2024.

Balancing funding responsibilities across all levels of government will be essential to ensure the long-term sustainability of these systems, and to achieve goals, particularly ahead of the projected significant increases in homelessness discussed in the next section.

THESE CHALLENGES WILL REQUIRE A HIGHLY COORDINATED APPROACH, BUILT ON ACCOUNTABILITY AND COLLABORATION, TO ADDRESS INCREASING NEEDS AND TO ENSURE INVESTMENTS ARE ALIGNED WITH OUTCOMES.



Methods and Limitations

Funding data was collected from 47 service managers across Ontario to support targeted analysis of housing and homelessness programs.

DATA COLLECTION AND ESTIMATION

Missing data points were addressed by estimating funding values using year-over-year percentage changes observed in Ontario and locally. This resulted in filling gaps in approximately 16% of the dataset. This process increased total funding estimates by 18%.

CATEGORIZATION

Funding streams were categorized into “housing” and “homelessness” programs for analytical clarity. This involved aggregating specific funding sources into those two categories, which may differ from how funding is reported locally or provincially.

Key Limitations

01

Data Reflects Actual Disbursements: The funding reported by service managers reflects amounts received, rather than multi-year funding commitments or public announcements. This distinction means there are differences when comparing these figures to reports that show aggregated commitments over longer periods.

02

Categorization Challenges: Many funding streams do not differentiate between housing and homelessness programs. While categorizing funding provides analytical clarity, it may create discrepancies when comparing totals with other sources that use different reporting formats.

03

Granularity Issues: Service managers do not always receive detailed breakdowns of provincial or federal contributions within cost-shared programs. This lack of granularity can lead to inconsistencies between local reporting and government datasets.

04

Scope of Analysis: Funding streams that are indirectly related to housing or homelessness—such as social supports or infrastructure programs—were excluded from this analysis. These exclusions may result in lower total figures compared to other reports that include broader funding categories.

The analysis includes provincial transfer payments to municipal service managers, but excludes funding directed to Ontario Aboriginal Housing Services and supportive housing providers funded by the Ministry of Health.

05

Methodological Differences: The specific approach to collecting and normalizing funding data in this analysis may differ from other reports or publicly available information, making direct comparisons and reconciliation inaccurate.

Further methodological details can be found in the Technical Notes section.

Interpreting this Section

Scope of Analysis

This analysis focuses exclusively on funding streams that are directly related to housing and homelessness programs, excluding broader categories like social supports or infrastructure investments. These exclusions mean that total figures presented here may appear lower than those found in reports that include additional funding areas.

Methodological Differences

The methodology used in this analysis to collect and normalize funding data differs from other publicly available reports. For example, funding streams were categorized into “housing” and “homelessness” for clarity, but many programs do not delineate allocations that way. Additionally, the data reflects reported expenditures rather than planned disbursements or multi-year funding commitments.

Given these differences, direct comparisons or reconciliation with other datasets may misrepresent the scope and context of this analysis. The figures presented here are intended to provide a targeted view of funding trends based on submissions by service managers, and should be understood within those specific parameters.

Findings

Ontario's housing and homelessness funding grows, with municipalities playing an increasingly key role

Between 2016 and 2024, total estimated funding for housing and homelessness programs in Ontario more than doubled, rising from \$1.9 billion to \$4.1 billion, based on data submitted by service managers. This substantial increase reflects the growing need to address housing instability and homelessness across the province. However, the funding trends reveal notable shifts in responsibility among federal, provincial, and municipal governments, with municipalities increasingly bearing a larger share of the overall financial burden, particularly for housing programs.

Table 20: Estimated Funding by Source for Homelessness and Housing Programs (\$M), Ontario, 2016–2024

		2016	2017	2018	2019	2020	2021	2022	2023	2024
Homelessness	Federal	46	56	91	141	168	217	257	381	430
	Municipal	133	163	223	239	255	250	499	325	501
	Provincial	272	283	309	333	644	825	642	706	700
	Other	1	2	17	10	14	13	12	41	4
Housing	Federal	297	314	293	241	270	387	341	400	375
	Municipal	792	838	849	923	929	1,132	1,308	1,446	1,644
	Provincial	273	314	226	179	204	282	298	312	319
	Other	92	102	102	97	132	111	132	160	189
Total		1,906	2,072	2,110	2,163	2,616	3,218	3,490	3,772	4,162

Adjusted

Missing values have been filled using additional research or statistical methods.

Table 21: Service Manager (SM) Submission Rates for Estimated Funding by Source for Homelessness and Housing Programs (\$M), Ontario, 2016–2024

		2016	2017	2018	2019	2020	2021	2022	2023	2024
Homelessness	SM Count	35	37	38	39	42	44	44	47	43
	Population %	77%	78%	78%	79%	85%	88%	88%	100%	88%
Housing	SM Count	46	46	46	46	46	47	47	47	43
	Population %	80%	80%	80%	80%	80%	100%	100%	100%	88%

Homelessness program funding grew significantly after 2020, rising from \$1.08 billion to \$1.64 billion by 2024. Municipal contributions nearly doubled during this period, increasing from \$255 million in 2020 to \$501 million in 2024, while federal funding nearly doubled between 2021 and 2024, increasing by 98%. In contrast, provincial funding for homelessness peaked at \$825 million in 2021, before declining to \$700 million in 2024.

Housing-program funding, which represents the bulk of total expenditures, steadily rose from \$1.4 billion in 2016 to \$2.5 billion in 2024. Municipalities accounted for the majority of this increase, with contributions growing by 108%, from \$792 million in 2016 to \$1.64 billion in 2024. By 2024, municipalities were responsible for 65.1% of all housing funding, up from 54.5% in 2016, illustrating municipalities' growing role in Ontario's housing system. Provincial funding for housing saw a modest increase during this period, while federal contributions remained smaller in scale, reflecting a slower rate of growth relative to municipal investments.

Figure 27: Funding Trends for Homelessness and Housing Programs by Source (Federal, Provincial, Municipal, Other), Ontario, 2016-2024

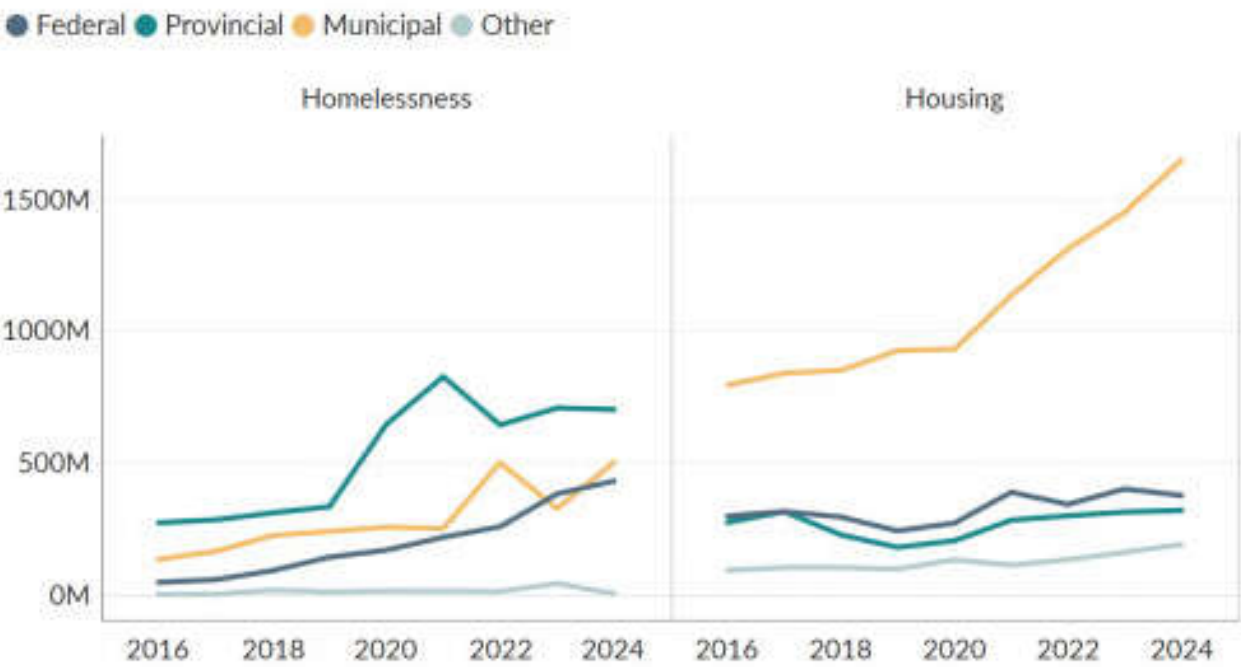


Figure 28: Percent Change in Funding for Homelessness and Housing Programs from 2021 by Source (Federal, Provincial, Municipal), Ontario, 2016-2024

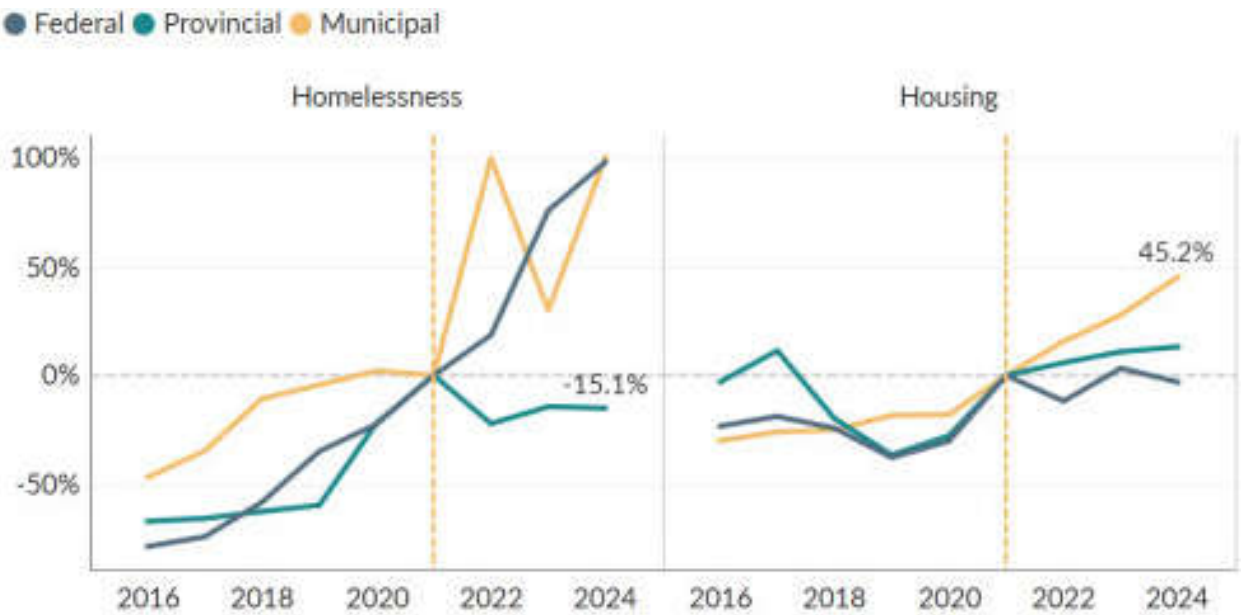


Table 22: Percent Change in Funding for Homelessness and Housing Programs from 2021 by Source (Federal, Provincial, Municipal), Ontario, 2016–2024

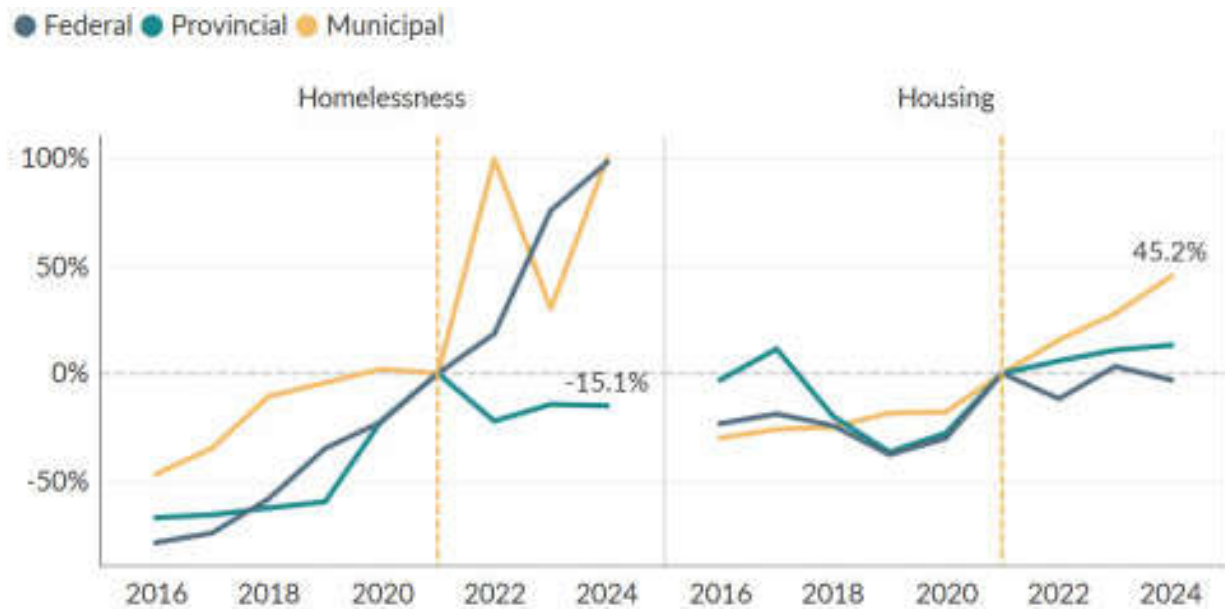
Percent Change from 2021		2016	2017	2018	2019	2020	2021	2022	2023	2024
Homelessness	Federal	46	56	91	141	168	217	257	381	430
		-78.6%	-74.2%	-58.3%	-34.9%	-22.4%	0.0%	18.5%	75.7%	98.1%
	Provincial	272	283	309	333	644	825	642	706	700
		-67.1%	-65.7%	-62.5%	-59.7%	-21.9%	0.0%	-22.2%	-14.4%	-15.1%
	Municipal	133	163	223	239	255	250	499	325	501
		-46.9%	-34.7%	-10.7%	-4.4%	2.1%	0.0%	99.6%	29.9%	100.2%
Housing	Federal	297	314	293	241	270	387	341	400	375
		-23.4%	-18.9%	-24.3%	-37.7%	-30.2%	0.0%	-11.8%	3.2%	-3.1%
	Provincial	273	314	226	179	204	282	298	312	319
		-3.1%	11.4%	-19.9%	-36.6%	-27.7%	0.0%	5.8%	10.8%	13.1%
	Municipal	792	838	849	923	929	1,132	1,308	1,446	1,644
		-30.0%	-26.0%	-25.0%	-18.4%	-18.0%	0.0%	15.6%	27.8%	45.2%

The data highlights that municipalities are not only contributing more funding overall but are also absorbing a larger share of responsibility in real terms. While federal homelessness funding has increased significantly in recent years, municipal governments continue to play a dominant role in housing funding, even as affordability pressures and system demands intensify. Without a proportional increase in provincial contributions to match growing municipal investments, the sustainability of this funding model could face significant challenges.

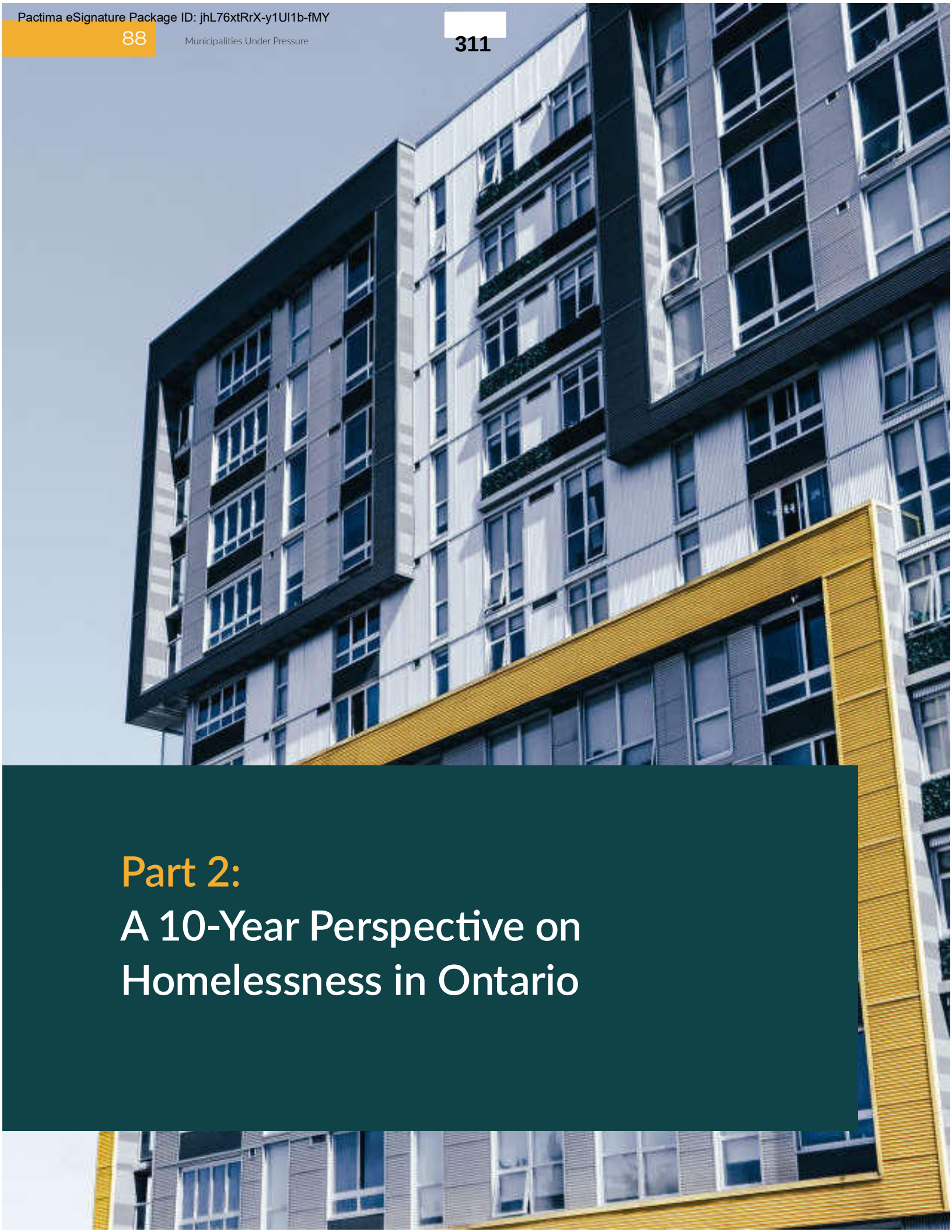
Figure 29: Percent of Total Program Funding by Source (Federal, Provincial, Municipal), Ontario, 2016–2024



Figure 30: Percent Change in Program Funding from 2021 by Source (Federal, Provincial, Municipal), Ontario, 2016–2024



While federal homelessness funding has increased significantly in recent years, municipal governments continue to play a dominant role in housing funding

A low-angle photograph of a modern, multi-story apartment building. The building features a mix of grey and white panels and large windows. A prominent yellow horizontal band runs across the lower portion of the building. The sky is clear and blue.

Part 2: A 10-Year Perspective on Homelessness in Ontario

This section provides a 10-year perspective on homelessness in Ontario, using submitted data from 47 service managers, combined with desk research and advanced statistical modelling techniques. This represents the first instance in Ontario where data directly collected by service managers has been used alongside advanced methods to model homelessness trends across the province. The analysis examines how economic and social factors—such as unemployment, income levels, and housing affordability—may shape known homelessness over time.

2.1: 10-Year Homelessness Projections

BUILDING ON THE FOUNDATIONAL DATA PRESENTED IN PART 1: A NEW LOOK AT ONTARIO'S HOMELESSNESS CRISIS, THIS SECTION EXPLORES HOW KEY ECONOMIC AND SOCIAL FACTORS COULD INFLUENCE HOMELESSNESS UNDER THREE SCENARIOS, WHICH WE ARE CALLING STEADY, DOWNTURN, AND UPTURN.

These projections lay the groundwork for **Part 3: Investing in Solutions**, which examines the potential effects of targeted investments across the housing and homelessness continuum.

By 2035, **known homelessness** in Ontario could range from 128,122 to 294,266 annually, depending on how economic conditions unfold. These projections underscore the significant role of economic and social factors in driving homelessness trends, offering a valuable framework for understanding potential outcomes. By exploring these scenarios, this model provides deeper insights into how shifting conditions may influence the future of homelessness across the province.

Methods and Limitations

To understand how homelessness might change in Ontario over the next decade, we developed a statistical model that examines economic and social patterns. This model analyzes the relationships between homelessness and factors like unemployment, household income, and housing costs and availability. The model uses data from 47 service managers, applying the standardization methods and data discussed in **Part 1: A New Look at the Ontario Homelessness Crisis**. This data was combined with Census 2016 and 2021 data, HART data, and CMHC data on core housing need.

To make projections through 2035, we created three different economic scenarios—steady, downturn, and upturn. Each scenario considers how economic changes might affect factors linked to homelessness. The steady scenario assumes current trends continue, while the downturn and upturn scenarios explore what might happen if economic conditions significantly worsen or improve.

Key limitations of the methodology are described below:

01

Scope of Analysis: The model considers only economic and social trends. It does not account for the effect of new programs, policy changes, or funding decisions that could affect homelessness outcomes. These factors are discussed in **Part 3: Investing in Solutions**.

02

Exclusions: These projections are based on the data from Part 1 and reflect only **known homelessness**—people identified through service use, enumeration efforts, by-name lists, or other data-collection efforts. While the input data includes a small fraction of people experiencing hidden homelessness, that is incidental and not representative of the broader hidden homelessness population. The model is not designed to account for or project hidden homelessness, nor does it include people in provincially run shelters or those in institutional settings.

03

Data Quality: While the model is statistically strong (explaining 90% of historical patterns), it relies on data from 2016 to 2024, which includes the unusual circumstances of the COVID-19 pandemic. Some data points were excluded due to quality concerns or inconsistent collection methods.

04

Regional Differences: Ontario's northern communities and non-northern areas experience different housing-market conditions and social factors that may not be fully captured in the model's province-wide assumptions.

05

Economic Uncertainty: While the model explores three possible economic futures, unexpected events like global economic shocks or major policy changes could lead to different outcomes than those projected.

06

Model Assumptions: The model assumes relatively straightforward relationships between economic conditions and homelessness. In reality, such relationships can be both more complex and more influenced by local factors not captured in the data.

Interpreting this Section

Scenarios

The projections present three possible economic futures and their effect on homelessness in Ontario:

- **Steady** assumes current socioeconomic trends continue, with only gradual changes in employment, income, and housing costs. This scenario provides a baseline for understanding potential homelessness trends under current conditions.
- **Downturn** represents deteriorating conditions, including rising unemployment, declining household incomes, and worsening housing affordability. This scenario helps us understand potential risks and pressures that could increase homelessness.
- **Upturn** reflects improved conditions through better employment rates, rising household incomes, and improved housing affordability. This scenario shows how positive economic changes could affect homelessness rates.

Understanding the Projections

The projections are not exact forecasts but instead a tool for understanding how homelessness might respond to changes in economic conditions. They highlight potential trends and outcomes to guide planning and policymaking.

Regional Definitions and Classifications

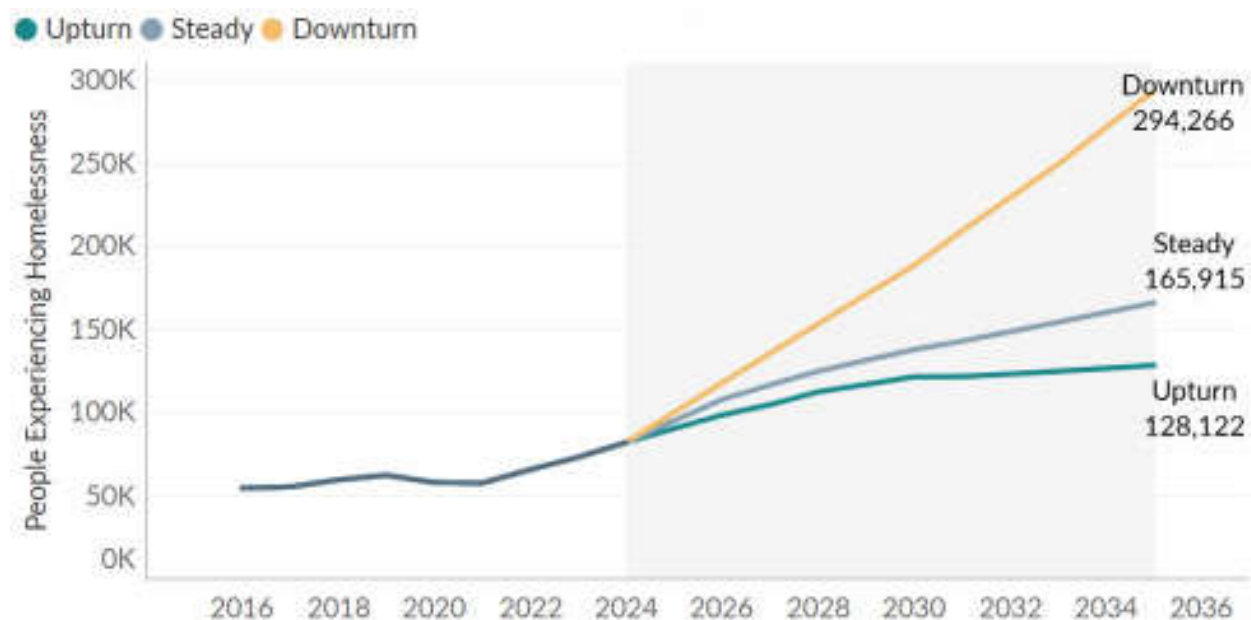
For this analysis, northern communities include those served by District Social Services Administration Boards and the City of Greater Sudbury. All other areas are classified as non-northern communities. **A full list is available in 1.1. People Experiencing Homelessness.**

Findings

In a steady economic scenario, over 160,000 people could experience homelessness in Ontario annually by 2035

The model estimates that the number of people experiencing **known homelessness** annually in Ontario could range from 128,122 to 294,266 by 2035, depending on economic conditions.

Figure 31: Projections of People Experiencing Homelessness Under Different Scenarios, Ontario, 2016–2035



THE ESTIMATE FOR 2024 IS 81,515 PEOPLE EXPERIENCING HOMELESSNESS, A NUMBER DERIVED FROM HISTORICAL DATA COLLECTED BY SERVICE MANAGERS.

Under a steady economic scenario, which assumes the continuation of current trends, the model projects that approximately 165,915 people could experience **known homelessness** annually by 2035.

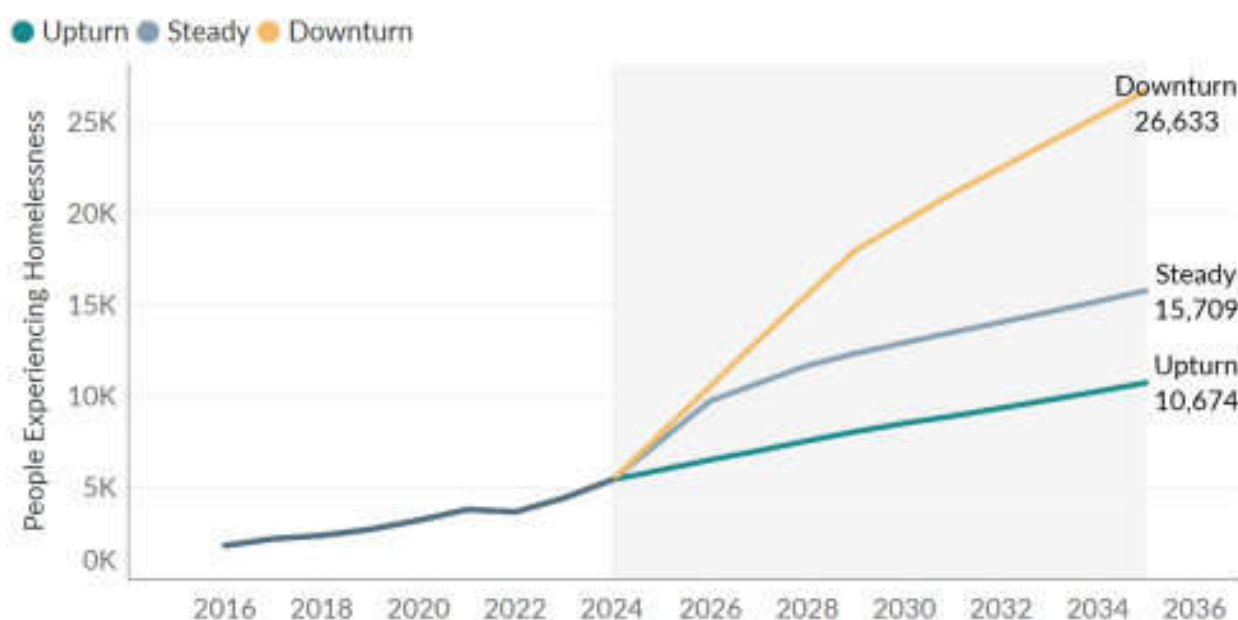
That number grows to 294,266 in a downturn scenario marked by higher unemployment, declining incomes, and worsening housing affordability. Conversely, in an upturn scenario with improvements in household incomes, employment rates, and housing affordability, the projection decreases to 128,122.



With stable economic conditions, over
15,000 people in Northern Ontario
could experience homelessness annually
by 2035, **while the non-northern
number could exceed 150,000**

The number of people experiencing **known homelessness** annually in Northern Ontario could range from 10,674 to 26,633 by 2035, depending on economic conditions. The estimate for 2024 is 5,377 people, derived from historical data collected by District Social Services Administration Boards. Under a steady economic scenario, which assumes the continuation of current trends, the model projects that approximately 15,709 people could experience **known homelessness** annually by 2035.

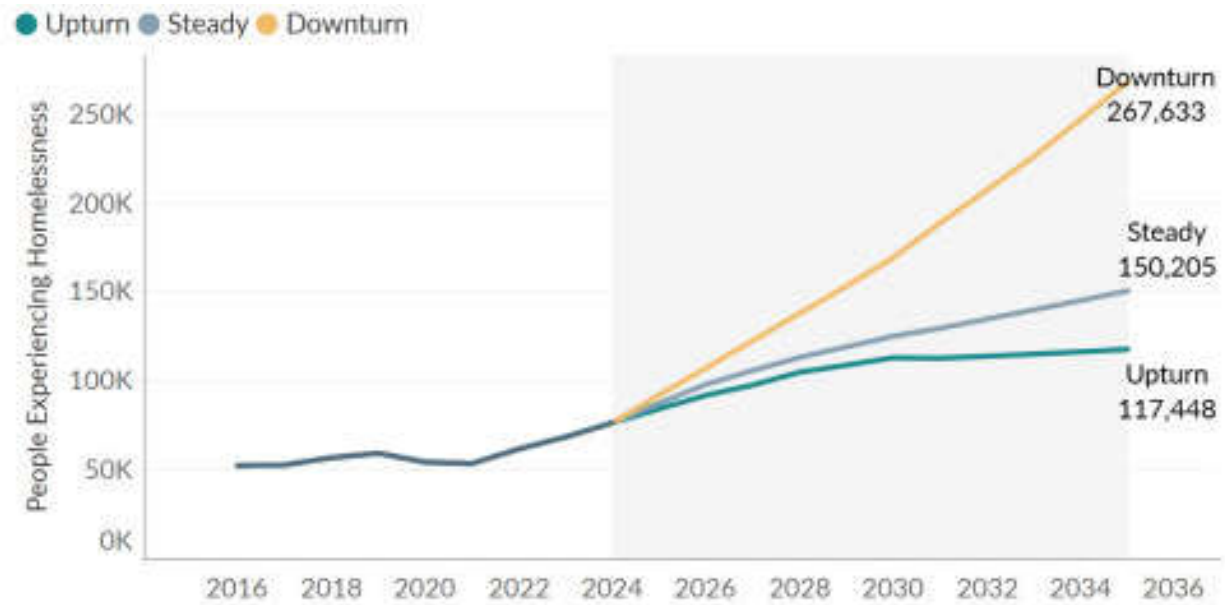
Figure 32: Projections of Number of People Experiencing Homelessness in Northern Ontario Under Different Scenarios, 2016–2035



This number rises to 26,633 in a downturn scenario marked by higher unemployment, declining incomes, and worsening housing affordability. Conversely, in an upturn scenario with improvements in household incomes, employment rates, and housing affordability, the projection decreases to 10,674.

Depending on economic conditions, the estimated number of people experiencing **known homelessness** annually in non-northern regions could range from 117,448 to 267,633 by 2035. Under a steady economic scenario, which assumes the continuation of current trends, the model projects that approximately 267,633 people could experience **known homelessness** annually by 2035.

Figure 33: Projections of Number of People Experiencing Homelessness in Non-northern Regions of Ontario Under Different Scenarios, 2016–2035



This number rises to 267,633 in a downturn scenario marked by higher unemployment, declining incomes, and worsening housing affordability. Conversely, in an upturn scenario with improvements in household incomes, employment rates, and housing affordability, the projection decreases to 117,448.



Part 3: Investing in Solutions

Scenario modelling is a tool used to explore potential outcomes based on specific investments or interventions. Unlike predictive modelling, which forecasts what will likely happen, scenario modelling examines what could happen under different assumptions or targeted actions. This approach helps governments, communities, and decision-makers understand the potential effects of specific strategies, identify gaps, and weigh options for achieving desired outcomes.

There is no single answer to addressing homelessness and housing instability. The scenarios presented here propose a recommended mix of interventions designed to deliver sustainable long-term solutions. Two scenarios are explored: the first examines what is needed to achieve an end to chronic homelessness to functional zero over a decade, while the second focuses on preventing and solving encampments through immediate action.

Rather than prescribing detailed actions for individual communities, these scenarios explore a systems-level framework for understanding the overall mix of resources, programs, and investments that could be needed. Costs, program combinations, and implementation strategies will vary, and must be adapted to local circumstances.

3.1: Scenario 1, Modelling an End to Chronic Homelessness

THIS SCENARIO CONSIDERS WHAT IT WOULD TAKE FOR ONTARIO TO REACH FUNCTIONAL ZERO HOMELESSNESS ACCORDING TO THE “BUILT FOR ZERO” MODEL DEVELOPED BY THE CANADIAN ALLIANCE TO END HOMELESSNESS.

Under this model, ending homelessness does not mean homelessness never occurs; instead, it means the systems in place respond quickly and effectively, making homelessness rare, brief, and non-recurring. In other words, the network of supports—to address structural challenges like income security and health—achieves a state of dynamic equilibrium, or “stasis,”⁵ whereby the system balances needs and resources, preventing prolonged housing instability.

Reaching this level of stability requires a robust social infrastructure and dedicated resources capable of addressing a wide range of housing challenges. From people sleeping in public spaces to those facing complex mental-health conditions, the response system must be flexible, coordinated, and able to adapt to diverse circumstances. By ensuring that unsafe or temporary living situations occur much less often and then are quickly resolved when they do occur, the homelessness-serving system is able to ensure homelessness remains manageable, short-lived, and exceptionally rare.

This scenario focuses on leveraging and enhancing the current system to address the full spectrum of homelessness, from low acuity to high acuity. It emphasizes expanding the supply of supportive and affordable housing, strengthening housing-focused case management, and scaling prevention and diversion programs to reduce the inflow into homelessness. Such an interconnected approach ensures that people receive the right support at the right time, preventing prolonged shelter stays or returns to homelessness.

This scenario assumes that the current homelessness-response system can adapt, evolve, and—fundamental to any systems change—improve, to build on existing investments in housing and homelessness programs, while addressing critical gaps to create a system that aligns supply with demand. This approach seeks to deliver housing stability and long-term sustainability by optimizing what already exists, without requiring a complete overhaul of Ontario’s homelessness response.

Methods and Limitations

To model the investments required to end chronic homelessness in Ontario, Scenario 1 uses data collected from Ontario's 47 service managers. This data forms the foundation of the projections, representing the ecosystems that service managers can observe and influence. While homelessness is inherently complex and interconnected with broader systems, this model focuses specifically on what can be achieved within the housing and homelessness sectors as represented by service managers' data. Data from parts 1 and 2 serve as starting points for this projection.

Key limitations of the methodology are described below:

01

Definitions and Costs: What is modelled here reflects housing and homelessness programs run through service managers. It does not include all types of supportive housing, such as health-run programs addressing the highest acuity of needs with intensive medical care, a significant gap in the current system. Therefore, these numbers may differ from other estimates of what is required, which might follow a more expansive definition of supports, particularly supportive housing.

02

Cost Variations: The operating and capital cost averages used in this model were derived from data reported by service managers. Because this modelling focuses on the programs and costs administered by service managers, those costs may not reflect the full spectrum of needs and expenditures for additional programs.

03

Regional Variations: Province-wide averages for costs and needs were used as a starting point, but they do not reflect the substantial regional differences in service delivery and costs. Using the province-wide averages as benchmarks for funding to be allocated to specific service managers would be inappropriate and potentially misleading.

04

System Optimization Assumptions: Scenario 1 assumes a better-functioning and more optimized system, including necessary investments in health, justice, education, and prevention systems, as well as relatively low negative exit rates, defined as better housing retention.

05

Placement Assumptions: The model presumes that people are matched to the right spaces for their needs—an ideal scenario where, for example, someone who requires supportive housing is not placed in a high-cost long-term care facility due to lack of alternatives. However, this assumption does not reflect the current realities of the system, where mismatches often occur due to resource constraints.

06

Data Standardization: Projections rely on data provided by service managers, which may include inconsistencies or gaps due to variations in data-collection methods. This challenge was compounded by the need to standardize data across 47 service managers with differing definitions, capacities, and resources.

07

Economic and Policy Uncertainty: Projections do not account for unforeseen challenges, such as economic downturns, emerging drug crises, or significant shifts in policy or funding that could affect homelessness outcomes.

Further methodological details can be found in the Technical Notes section.

Interpreting this Section

Net New Spaces

The projections estimate the number of additional spaces needed to achieve functional zero for chronic homelessness. These net new spaces are based on assumptions about current capacity and the investments required to stabilize the system and address unmet needs.

Over time, as homelessness prevention efforts expand and positive exit rates increase, the need for certain crisis responses is expected to decline. This will allow the system to shift resources strategically, focusing on long-term housing stability rather than emergency measures.

Inflows and Outflows

Achieving functional zero means addressing both the inflows of people entering homelessness and the outflows of people successfully transitioning into stable housing. That balance ensures that homelessness is rare, brief, and non-recurring.

Housing Choice

Although not explicitly modelled, individual choice in housing placement is critical. Ensuring that people are matched with housing that meets their specific needs is essential for long-term stability and success.

Understanding the Projections

The projections are not precise forecasts, but rather a means for exploring how specific investments could stabilize and improve the housing and homelessness system. They highlight opportunities for progress, while acknowledging systemic challenges.

Findings

\$11 billion over 10 years to end chronic homelessness

Achieving functional zero homelessness in Ontario through an optimized and scaled homelessness-serving system requires significant and targeted investments. These investments fall into two main categories: operational expenses and capital expenses. Together, they reflect the resources needed to expand capacity, address critical gaps, and align the system with the needs of people experiencing homelessness.

To achieve functional zero, inflows into homelessness must be decreased. This scenario addresses both current and future chronic homelessness through substantial investment in affordable housing and prevention, while also managing the need to support outflow from homelessness.

Operational Expenses

Operational expenses include the ongoing funding required for solutions, including supportive housing, case management, prevention programs, and rent assistance. Over 10 years, these costs are estimated at \$3.3 billion, or approximately \$329 million annually.

This funding is in addition to the current \$4.1 billion reported annually by service managers for existing homelessness and housing programs.

Operational expenses prioritize expanding the programs that have the greatest effect on long-term housing stability, as described below.

SUPPORTIVE HOUSING

\$165 million over 10 years, so that people with high needs receive housing paired with wraparound services.

TRANSITIONAL HOUSING

\$90 million over 10 years, providing short-term support for people transitioning from homelessness.

HOUSING AND CASE MANAGEMENT

\$231 million over 10 years, supporting people with moderate needs through intensive case management.

PREVENTION/DIVERSION PROGRAMS

\$17.5 million over 10 years, reducing inflow into homelessness through early intervention.

RENT ASSISTANCE

\$1.25 billion over 10 years, to support securing and maintaining housing through subsidies.

Capital Expenses

Capital expenses represent the funding required to build and develop new housing infrastructure. Over 10 years, the total capital investment needed is estimated at \$7.7 billion. Most of that investment—\$7.4 billion—is allocated to subsidized housing, which reflects the scale of the affordable-housing shortage in Ontario.

Other capital investments focus on addressing specific program needs.

SUPPORTIVE HOUSING

\$250 million, creating 1,000 net new spaces for people with high-acuity needs.

TRANSITIONAL HOUSING

\$60 million, supporting shorter-term housing solutions and 600 net new units.

Balancing Investments

This approach balances infrastructure development with program delivery. Capital investments ensure the availability of physical spaces, while operational funding supports the services required to make those spaces effective. For example, subsidized housing requires building units and ongoing rent subsidies to ensure affordability for renters.

The Bottom Line

The combined investments total \$11.0 billion over 10 years, including \$7.7 billion allocated to capital expenses and \$3.3 billion for operational expenses, while assuming the continuation of current annual investments totalling \$4.1 billion. Though these costs are substantial, they reflect the urgency of the housing crisis in Ontario. As noted in Part 1, there are currently 232,419 households on the waitlist for community housing, with a median wait time of five years. In addition, projections indicate that more than 165,000 people could be experiencing homelessness by 2035.

Nearly \$1 billion annually (\$957.7 million) is spent on emergency shelters, a necessary system component that neither prevents inflow into homelessness nor facilitates long-term outflow. This functional limitation contributes to the increasing proportion of chronic homelessness within overall homelessness rates.

INVESTING IN HOUSING AND PREVENTION MEASURES ADDRESSES THE IMMEDIATE CRISIS. IT REDUCES LONG-TERM COSTS BY MINIMIZING RELIANCE ON EMERGENCY SHELTERS AND ALLEVIATING HEALTHCARE, JUSTICE, AND OTHER PRESSURES ON SOCIAL SYSTEMS.

Capacity Expansion and Acuity Alignment

With the investments outlined above, and acknowledging that both capital and operational costs vary significantly across the province due to regional differences, inconsistent definitions, and local operational practices, this scenario estimates the addition of 75,050 net new unit and caseload spaces over the next 10 years. These new spaces are designed to address critical gaps and to better align resources to the needs of people experiencing homelessness.

This modelling approach emphasizes the need for a significant expansion in affordable housing, while maintaining essential crisis response capacities like emergency shelters and outreach supports. Over time, strategic repurposing of transitional or emergency facilities will allow the system to adapt to changing population needs and housing-market pressures.

Net New Capacity

The proposed capacity expansion focuses on several key program types.

AFFORDABLE HOUSING

An additional 40,000 spaces will address the critical shortfall in affordable housing. This program is particularly effective for low- and moderate-acuity needs for people who require minimal supports and need long-term stability.

RENT ASSISTANCE

Adding 32,000 subsidies will help at-risk households secure or maintain housing in the private rental market, providing a crucial buffer against homelessness.

SUPPORTIVE HOUSING

With 1,000 new spaces, this program targets people with high-acuity requirements who need intensive support, combining permanent housing with wraparound services to ensure long-term success.

HOUSING AND CASE MANAGEMENT

The addition of 1,000 new spaces will allow support for people with moderate needs through intensive case management.

TRANSITIONAL HOUSING

The addition of 600 spaces will provide short-term accommodations for people in crisis, helping them transition into permanent housing solutions.

PREVENTION AND DIVERSION PROGRAMS

An additional 450 spaces will be dedicated to early intervention efforts, reducing inflow into homelessness through targeted support.

Acuity Alignment

The capacity expansion has been designed to match the diverse acuity levels of people experiencing homelessness.

HIGH ACUITY

For people with the most complex and ongoing needs, such as chronic health conditions or severe mental-health challenges, programs like supportive housing and intensive case management are prioritized.

MODERATE ACUITY

For those who require temporary or moderate support, transitional housing, rent assistance, and moderate-intensity case management programs are key interventions.

LOW ACUITY

For people with minimal support needs, subsidized housing and prevention/diversion programs offer stable housing solutions without intensive services that are not required.

Addressing System Bottlenecks

Emergency shelters and outreach programs remain critical components of the homelessness-response system. These services provide essential crisis intervention, stabilize people during acute crises, and connect them to broader resources. However, the current system relies too heavily on emergency shelters, with many people unable to exit due to a lack of appropriate long-term housing options. This reliance stretches shelter capacity and drives increases in unsheltered homelessness.

This scenario emphasizes the importance of creating spaces where people can exit to stable housing, helping to prevent prolonged stays in shelters and encampments. The approach aims to reduce reliance on shelters over time by expanding housing options for people across acuity levels. While crisis response will remain an essential part of the system and may even require temporary short-term expansion, the ultimate solution rests in ensuring adequate and appropriate spaces for people to transition out of homelessness.

—

This scenario emphasizes the importance of creating spaces where people can exit to stable housing

Integration into Broader Systems

Building capacity is critical, but it is not enough to achieve long-term success in reducing homelessness. Without substantial investments in direct service provision—particularly in substance use and mental health supports within the healthcare system—the true gains from the recommended \$11-billion investment in housing and homelessness programs will not be fully realized. Minimizing negative exits and ensuring people do not cycle back into the system requires a coordinated, multi-system effort that addresses the broader social determinants of homelessness.

Expanding housing capacity is a critical step toward addressing homelessness. Still, it must be paired with broader optimization and alignment efforts across critical systems, including health, justice, immigration settlement, education, and poverty reduction/financial support. Housing and homelessness responses depend on these complementary systems to create pathways for long-term stability and reduce the inflow into homelessness.

The optimization scenario in the model recommends improvements in the following:

HEALTH SYSTEM

Investments in addiction treatment, detox programs, primary care, and preventative health measures are essential to supporting people as they transition out of homelessness and maintain housing stability.

JUSTICE SYSTEM

The development of diversion courts, community safety initiatives, and crime prevention strategies reduces the overrepresentation of justice-involved people in homelessness and creates better reintegration pathways.

IMMIGRATION & SETTLEMENT SYSTEMS

Targeted support for newcomers and refugees mitigates the risks that can lead to homelessness, ensuring alignment between housing responses and settlement services.

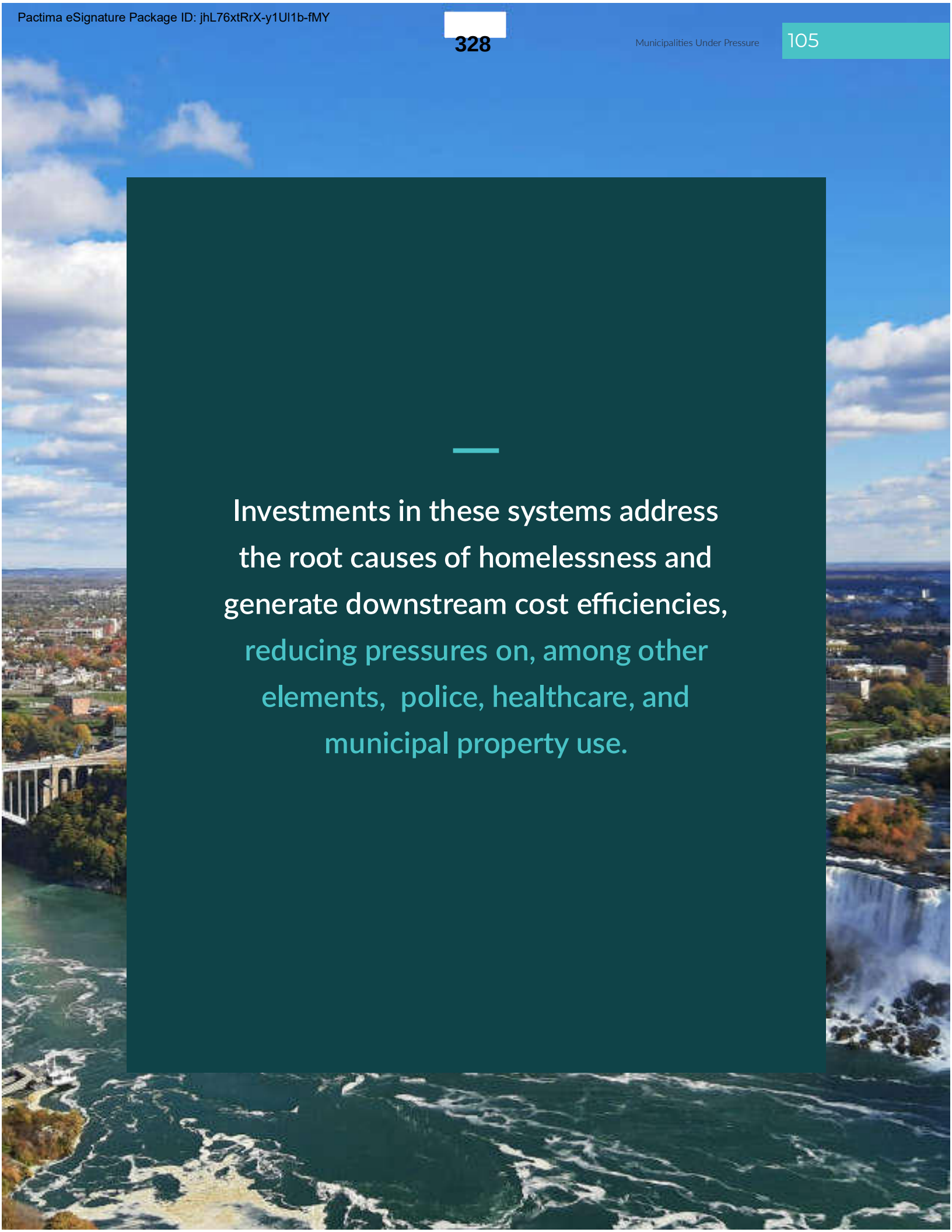
EDUCATION SYSTEM

Early prevention through community education and outreach addresses the root causes of poverty and homelessness, helping individuals and families before they face housing crises.

FINANCIAL SUPPORT SYSTEMS

Poverty reduction initiatives and income stabilization programs are critical to preventing at-risk populations from entering homelessness in the first place.

WHILE HOUSING-FOCUSED SOLUTIONS ARE CENTRAL TO THIS MODEL, THEY DEPEND ON A COHESIVE, MULTI-SYSTEM EFFORT TO ADDRESS IMMEDIATE AND SYSTEMIC NEEDS.

An aerial photograph of Niagara Falls, showing the turbulent water of the rapids in the foreground and the falls themselves on the right. The surrounding cityscape is visible in the background under a blue sky with scattered clouds. A dark teal rectangular box is overlaid on the center of the image, containing white text.

Investments in these systems address the root causes of homelessness and generate downstream cost efficiencies, reducing pressures on, among other elements, police, healthcare, and municipal property use.

3.2: Scenario 2, Modelling a \$2 Billion Investment

THIS SCENARIO MODELS HOW A TARGETED \$2 BILLION INVESTMENT COULD ADDRESS ONE OF ONTARIO'S MOST VISIBLE AND PRESSING CHALLENGES: ENCAMPMENTS.

Encampments reflect complex systemic issues, and the number of people residing in them varies widely due to challenges in enumeration. Definitional inconsistencies—whether counting tents, individuals, or sites—make data unreliable. Encampments range significantly in size, from small clusters to larger settlements of 50 or more people. Their transient nature, combined with shifting policies on sanctioned or unsanctioned sites, further complicates modelling efforts. Despite discrepancies in estimating the number of people living in encampments, the evidence is sufficient to show that addressing encampments requires urgent and immediate action.

The reasons people reside in encampments are diverse and intersecting. While some people require intensive supports, others face barriers stemming from housing affordability, accessibility, or gaps in prevention systems. People reside in encampments for many reasons, including barriers to accessing shelters, such as restrictive policies, safety concerns, or the lack of accommodations for families or pets. For some, these barriers are compounded by discrimination or systemic inequities, including those based on race, indigeneity, gender, sexuality, or other identities. Others face challenges stemming from substance use, mental health issues, or prior bans from shelters.

THIS SCENARIO FOCUSES ON HOUSING AND SUPPORT SOLUTIONS THAT DELIVER URGENT AND IMMEDIATE ACTION WHILE ENSURING LONG-TERM, SUSTAINABLE OUTCOMES. IT EMPHASIZES INTERVENTIONS THAT STABILIZE PEOPLE QUICKLY, ADDRESS ROOT CAUSES, AND CREATE PATHWAYS OUT OF ENCAMPMENTS TO PREVENT RECURRENCE—NOT SIMPLY TEMPORARY SOLUTIONS.

Methods and Limitations

This scenario shares the same methodological limitations as Scenario 1, including its reliance on programs funded by service managers, a narrow definition of supportive housing programs run through the housing and homelessness system, cost variations, assumptions about system optimization, and the use of province-wide averages, which should not be used as benchmarks for individual service managers or regions.

Additionally, Scenario 2 is constrained by inconsistent and incomplete data on the number of people living in encampments, how these populations fluctuate throughout the year, and the current state of encampments.

Further methodological details can be found in the Technical Notes section.

Interpreting this Section

Differences Between Scenario 1 and Scenario 2

Scenario 2 is distinct from Scenario 1 in both principle and purpose. While Scenario 1 models what is required to end chronic homelessness over 10 years, Scenario 2 focuses on immediate action to address the significant and visible challenge of encampments within a shorter timeframe. Scenario 2 models a \$2-billion investment to be deployed over three years, with ongoing operational support for housing continuing for an additional five years, for a total of eight years.

Scenarios 1 and 2 represent fundamentally different approaches to addressing homelessness. Scenario 1 focuses on achieving a specific outcome—ending chronic homelessness—over a 10-year period, while Scenario 2 models the effects of a \$2-billion investment aimed at addressing the immediate and urgent issue of encampments. These scenarios address different aspects of the broader homelessness crisis and are not directly comparable or additive.

Sustaining Support for Immediate Action

Scenario 2 prioritizes immediate action to address the urgent needs of people currently living in encampments, many of whom face significant harm and lack access to safe, stable housing. The investment modelled here focuses on capital and operating expenses for the first three years to address the immediate crisis, with an additional five years of continued operating support to ensure the investments made during the initial period are sustained.

Findings

A \$2-billion investment toward preventing and solving encampments

Encampments and unsheltered homelessness are among Ontario's most pressing and visible challenges, requiring fast, decisive, and coordinated action. Scenario modelling was designed around a fixed \$2 billion investment; however, the final modelled amount came to \$2.017 billion, which allowed for the creation of 5,700 net new housing and support spaces. These spaces would provide immediate capacity to stabilize people, reduce the instability caused by encampments, and prevent their recurrence or displacement. This approach aims to improve safety and wellbeing for both individuals and communities.

While focusing solely on encampments misses a broader opportunity to address homelessness sustainably as a whole, this approach does enable immediate, measurable progress. The first three years of this investment could stabilize housing for approximately 8,443 people, representing 10.4% of the total estimated known homeless population for 2024 (81,515 people) referenced in Part 1. Over the implementation period, these spaces are expected to result in 27,812 service interactions over eight years, as a measure of how many times spaces or supports are actively accessed. This reflects the dynamic nature of the system, as people move in and out of homelessness and may access more than one type of support, rather than representing unique individuals.

Net New Capacity

This model presupposes the creation of 5,700 net new spaces, designed to address diverse needs across the homelessness system. While many encampment residents could benefit from high-acuity supports, others could be effectively supported through medium- or low-acuity housing solutions. At a local level, these spaces must be tailored to address specific needs, varying in design based on the populations they serve. Understanding who resides in encampments, why they are there, and potential barriers to accessing existing crisis responses is essential for ensuring these spaces are effective.

For example, if data shows that youth are overrepresented in encampments, gender-specific transitional housing programs could divert young people from these settings. Similarly, culturally safe Indigenous-led supportive housing could meet the needs of Indigenous populations, while specialized housing may be required for people dealing with the long-term effects of substance use or brain injuries. Tailored approaches like these are critical to addressing the most significant barriers to stability.

THE LONGER PEOPLE EXPERIENCE HOMELESSNESS, THE MORE LIKELY THEY ARE TO DEVELOP HIGHER NEEDS, UNDERSCORING THE NEED FOR IMMEDIATE AND COORDINATED ACTION TO STABILIZE PEOPLE'S CIRCUMSTANCES AND ADDRESS SYSTEMIC DRIVERS OF ENCAMPMENTS.

Table 23: Net New Spaces and Service Interactions by Program Type, 3-Year and 8-Year Totals

Program Type	Net New Spaces (3 Years)	Service Interactions (8 Years)
Supportive Housing	3,000	6,240
Transitional Housing	600	3,480
Housing and Case Management	600	1,302
Prevention/Diversion	1,000	15,625
Rent Assistance	500	1,165
Total	5,700	27,812

Capital Expenses

Capital costs represent the funding required to build and develop new housing infrastructure. Over three years, the total capital investment is estimated at **\$810 million**, which focuses on constructing net new supportive and transitional housing units.

SUPPORTIVE HOUSING

\$750 million, creating 3,000 net new spaces for people with high-acuity needs.

TRANSITIONAL HOUSING

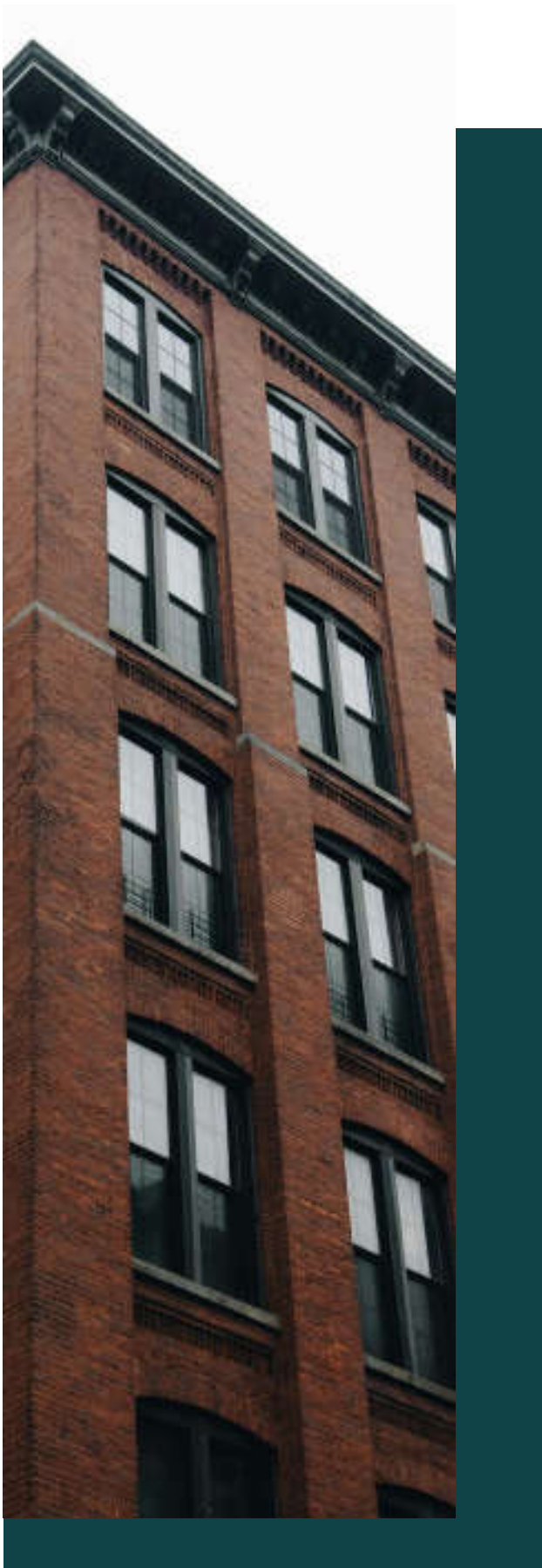
\$60 million, supporting shorter-term housing solutions with 600 net new spaces.

These investments are critical to rapidly increasing the system’s capacity to address the immediate need for housing and stabilization options.

Supportive Housing

As noted in the Methods and Limitations sections for Scenarios 1 and 2, supportive housing is a broad term used to describe a wide range of housing programs that provide various levels of support and intervention. These programs may differ significantly in their purpose, intensity, and funding models. For example, some supportive housing programs involve lighter-touch interventions managed by housing and homelessness teams, while others provide intensive health supports, funded through the Ministry of Health, and resemble long-term care facilities in their complexity.

In this scenario, an annual operating cost of \$40,000 per unit was used as a baseline, derived from data provided by service managers and adjusted upward to reflect the typical range of supports offered. However, the variability in supportive-housing models means this figure may not fully capture the costs of more intensive programs, such as health-run programs addressing severe health or substance-use challenges.



Operational Expenses

Operational costs encompass the ongoing funding required to run these spaces and deliver housing-focused solutions over an eight-year period. These costs are estimated at **\$1.2 billion**, or approximately **\$151 million annually**.

Operational investments prioritize programs that provide both immediate stabilization and longer-term housing outcomes.

SUPPORTIVE HOUSING

\$840 million over eight years, providing housing paired with wraparound services for people with higher and more complex needs.

HOUSING AND CASE MANAGEMENT

\$189 million over eight years, supporting people with moderate needs through tailored case management.

TRANSITIONAL HOUSING

\$126 million over eight years, offering short-term support for people transitioning from homelessness.

PREVENTION/DIVERSION PROGRAMS

\$52.5 million over eight years, reducing inflow into homelessness through early interventions.

Regional Differences

Encampments and unsheltered homelessness are not unique to urban or non-northern communities. They affect rural and urban areas across Ontario, with significant effects in both northern and non-northern contexts. However, Northern Ontario faces distinct challenges that require tailored considerations in this scenario. A lack of infrastructure and limited local service capacity often force people to migrate to urban centres in search of support, exacerbating pressures on urban systems while obscuring the full scale and complexity of homelessness in the north.

In the context of this scenario, Northern Ontario's need for housing and support spaces could account for as much as 20% of the total projected requirement, considering the north's rapid homelessness growth rates and the greater needs of underserved Indigenous communities. These spaces must be designed to address both the immediate crisis of encampments and the systemic barriers that perpetuate homelessness in these regions.

While the actual number of people experiencing homelessness in Northern Ontario is lower than in urban or non-northern areas, these figures obscure the outsized effect that complex homelessness in the north has on communities across the province, including urban areas. For instance, homelessness in Northern Ontario has grown by 204% since 2016, far outpacing provincial averages.

In addition to representing a significant proportion of service need, encampments in Northern Ontario are shaped by distinct local factors, including geographic isolation, higher construction costs, and limited shelter capacity. For example, northern construction costs average \$500 per square foot for a standard 700-square-foot unit, resulting in \$350,000 per unit. To ensure equitable funding, funding formulas must reflect these cost disparities, ensuring that resources are sufficient to address regional variations without placing undue strain on local systems.

Additional modelling is needed to fully assess the effects of localized funding in Northern Ontario, particularly given the unique needs of Indigenous communities, including those on reserve. This should be done at the behest of First Nations and Indigenous governments. Tailored investments in culturally safe, Indigenous-led housing solutions, as well as strategies to stabilize populations locally and reduce service migration, are critical to ensuring that northern communities are equitably supported within this broader response.

Integration into Broader Systems

If chronic homelessness is viewed as a measure of systemic failure, then the experiences of people living in encampments should be seen as an even more acute indicator of multi-system failure. These experiences reflect significant gaps in housing, healthcare, and social supports, as well as challenges in addressing capacity and program availability. Multi-system failures require multi-system responses, and no single tool—whether it be housing, legal responses, health supports, or poverty reduction—can fully address the complexity of the issue on its own.

This scenario demonstrates how a \$2.017 billion investment can be used to create supportive and transitional housing for people with more complex needs. By focusing on housing capacity and pathways to stability, the scenario addresses a critical portion of the homelessness system, while also acknowledging the need for complementary efforts across sectors.

Discussion

THE GROWING SCALE OF ONTARIO'S HOMELESSNESS CRISIS

Ontario is in the midst of a homelessness crisis that has grown significantly over the past decade. Between 2016 and 2024, the annual number of people experiencing homelessness rose from 53,930 to 81,515—a 51% increase. Chronic homelessness, which now accounts for more than half of all cases of homelessness, has tripled during this time.

Projections suggest that without significant intervention, the situation could worsen. By 2035, the number of people experiencing homelessness in Ontario could range from 128,122 under optimistic economic conditions to as high as 294,266 in an economic downturn. These estimates underscore the urgent need for action to prevent higher rates of homelessness and to address the systemic factors driving homelessness.



UNDERSTANDING INTERCONNECTIONS ACROSS POLICIES

Homelessness is not just a housing issue—it is a barometer of systemic gaps across housing, healthcare, mental health, income support, and justice systems. Homelessness is driven by a wide range of issues: the lack of affordable housing, inadequate mental-health care, insufficient shelter capacity, worsening substance use, and gaps in immigration support, among others. Each instance of homelessness reflects the ripple effects of misaligned or underfunded policies.

Chronic homelessness, in particular, serves as evidence that people are not receiving the supports they need to move forward and achieve stability. For some people, including Indigenous populations, systemic failures in the ecosystem are compounded by additional inequities, entwined with intergenerational trauma, discrimination and racism.

ADDRESSING INEQUITY OF INDIGENOUS HOMELESSNESS

Indigenous people are disproportionately represented among Ontario's chronically homeless population, reflecting the enduring effects of colonialism, systemic inequities, and cultural disconnection across health, housing, and governance systems. While Indigenous people make up only 2.9% of Ontario's population, they account for a significant portion of those experiencing chronic homelessness. Data from service managers highlights notable regional disparities, with Indigenous representation among chronically homeless populations averaging 44.6% in northern regions and 13.8% in non-northern regions. As stated in the report, this is believed to be an underrepresentation, as Indigenous populations are often underserved and under represented in systems, reports, and data. Historical exploitation and harm caused by data-collection processes, combined with systemic racism and mistrust of institutional systems, further contribute to gaps in accurate representation.

Systemic barriers, such as exclusion from mainstream housing programs and the lack of culturally safe and Indigenous-led spaces, continue to leave Indigenous populations underserved. Structural definitions of homelessness, rooted in colonial frameworks, fail to reflect Indigenous realities of home, displacement, and community.

The Definition of Indigenous Homelessness underscores how drivers such as intergenerational trauma, systemic racism, and dispossession of land and culture have uniquely shaped Indigenous experiences of housing instability. These factors highlight the need for holistic, culturally informed approaches that address not only physical shelter but also the restoration of cultural and community connections.⁶

Any discussion about capacity, housing solutions, and funding must centre on addressing the profound housing inequities and chronic underfunding on reserves, alongside the lack of Indigenous-led supports and culturally safe services in both urban and rural areas. These inequities are further compounded by limited resources to enumerate the full extent of need, which restricts the ability to advocate effectively for appropriate funding and services. Additionally, barriers to data sharing and systemic gaps in collecting reliable, culturally informed data hinder Indigenous-led organizations from designing and delivering solutions that fully address the unique challenges faced by their communities.

CHANGES IN THE PROFILE OF CHRONIC HOMELESSNESS

Chronic homelessness is not static—it is evolving and will continue to change over time. We cannot make assumptions about who is experiencing chronic homelessness, as the data shows a shifting and increasingly diverse profile of people in that situation. For example, nearly one in four people experiencing chronic homelessness in Ontario are children or youth, with children (ages 0–15) accounting for 12% and youth (ages 16–24) making up 11% in 2024. Similarly, the representation of refugees and asylum seekers in chronic homelessness has grown significantly, increasing from 1,834 in 2020 to 10,552 in 2024. These changes highlight the need to adapt our understanding of chronic homelessness to respond to its changing reality.

This data is critical to understanding who is experiencing homelessness, and how, where, and why they are experiencing it. While aggregate data helps paint a picture, the most powerful insights come from the capacity-building that service managers are undertaking to collect and analyze local data. These efforts support the development of tailored, evidence-based solutions that reflect the unique needs and experiences of diverse populations experiencing chronic homelessness.

THE SHIFTING GEOGRAPHY OF CHRONIC HOMELESSNESS

Not only is chronic homelessness changing in who it affects, but also where it is being experienced. In Northern Ontario, homelessness has grown by 204% between 2016 and 2024, far outpacing aggregate growth in the rest of the province. Geographic isolation, limited social infrastructure, and declining affordability and supports create distinct barriers to housing stability in the region. Indigenous people are disproportionately affected, with their representation in some areas exceeding 50% of the chronic homelessness population, underscoring the need for culturally safe and Indigenous-led solutions.

Similarly, rural homelessness is becoming more visible as smaller communities grapple with rising demand for services. These areas often lack resources for crisis response, or specialized supports, forcing individuals and families to seek assistance in nearby hubs or remain in precarious situations.

THE CRITICAL ROLE OF LOCALIZED SYSTEMS PLANNING

Service managers, municipalities and local networks are at the heart of Ontario's homelessness response, playing a vital role in coordinating and implementing housing programs across the province. Between 2016 and 2024, municipal funding for housing and homelessness more than doubled, rising from \$1.04 billion to \$2.14 billion. By 2024, municipalities accounted for 65% of reported housing funding, reflecting their growing role in addressing housing instability and homelessness.

Moving forward, balancing contributions across all levels of government will be key to maintaining a sustainable and effective response to homelessness. Collaborative approaches built on shared accountability and a commitment to long-term outcomes will allow service managers to continue leading innovative, community-based solutions.

ADVANCING DATA-LED DECISION-MAKING CAPACITY

Significant advancements in data collection and systems planning—defined as a coordinated approach to designing, implementing, and managing programs and resources across multiple sectors—have strengthened Ontario's ability to address homelessness. Service managers have significantly improved data capacity and collection processes, paving the way for more accurate tracking of homelessness trends, program performance, and service gaps.

This evolution is evident in the success of the collaborative effort required for this report. Supported by all three major associations (AMO, OMSSA, NOSDA), and with 100% participation from Ontario's 47 service managers, the analysis reflects a shared commitment to advancing consistent data collection and forecasting methods. While some data gaps inevitably remain, the progress demonstrated here marks an important step toward fully integrating systems planning into homelessness responses across the province.

To sustain this progress, continued improvements in data quality, collection processes, and standardization are essential—and these efforts must be effectively resourced. Service managers need the capacity to carry out this work directly and to hire people with the skills to build and maintain robust data systems locally. Strengthening internal capacity is key to reducing reliance on external consultants, while ensuring that accountability mechanisms are matched to expenditures, program performance, supply, program definitions, outcomes, and more.

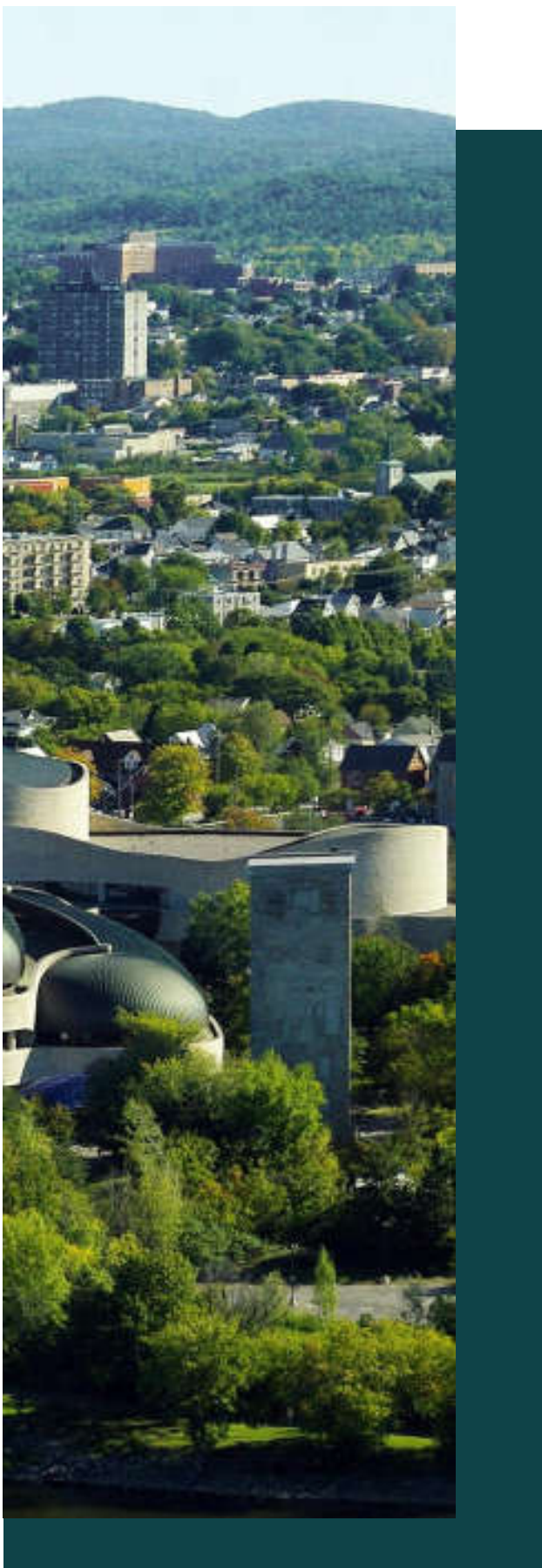
MOVING TO LONGER-TERM SOLUTIONS

The data collected for this report shows that the current path is not sustainable. In a well-functioning system, emergency shelters serve as temporary crisis intervention, particularly in areas where no other options are available. They are not a long-term solution. However, in 2024, emergency shelters accounted for 65.2% of total homelessness-program expenditures, as reported by service managers, reflecting a system heavily oriented toward crisis management. The reliance on shelters often results in individuals and families spending extended periods in spaces that were never designed for prolonged use, with very limited options for safe and stable exits.

While emergency shelters are essential for addressing immediate crises, greater investments in preventative measures, supportive housing, and affordable housing are critical to reducing the inflow into homelessness and providing stable exits to avoid chronic homelessness. Over time—and it will take time—curbing both inflow and outflow through a coordinated policy ecosystem will allow the homelessness-serving system to begin to realign resources toward long-term solutions. This realignment will enable the system to better support individuals and families to achieve stability.

These principles form the foundation for the investment scenario outlined in this report, which estimates that achieving functional zero in chronic homelessness will require \$7.7 billion in capital investments and \$3.3 billion in operational funding over the next decade. While substantial, these investments are necessary to build the infrastructure and systems required to end chronic homelessness and ensure long-term stability for those affected and those at risk.

The data and insights provided by such strengthened capacity make it clear that the current system, heavily reliant on a crisis response, is unsustainable.



MULTI-SYSTEM INTEGRATION

The true cost of homelessness, particularly for those experiencing it long term, extends far beyond individuals to affect families, communities, and society as a whole. Chronic homelessness is often accompanied by worsening physical and mental health, reduced life expectancy, and limited opportunities for social and economic participation. Communities also face significant pressures, including increased demand on emergency shelters, healthcare systems, and justice services—systems that are costly to maintain and frequently fail to address the underlying causes of homelessness.

Addressing chronic homelessness is not only a moral imperative but also a matter of public health, community safety, equity, and economic sustainability.

Ending chronic homelessness is not only about meeting immediate or even long-term numeric targets; it is also about how effectively our social-services systems support those who are in need and at risk. Achieving functional zero requires a coordinated policy framework that integrates housing with healthcare, mental-health care, justice, income supports, and other systems—much like the legislated community-safety and wellbeing plans are intended to do.

Focusing on where programs and policies intersect can amplify the value of investments. For example, combining prevention efforts with rent assistance can stabilize households before they fall into homelessness, while linking supportive housing with culturally safe healthcare can improve outcomes for those transitioning out of homelessness. Strategic alignment of resources reduces duplication, maximizes efficiency, and delivers lasting solutions.

With refined data collection and integrated modelling, policymakers can use today's investments to support strategies that will create enduring stability. By shifting from reactive crisis management to forward-looking, coordinated and proactive solutions, Ontario can reduce homelessness. It can also build a system that prioritizes the wellbeing of individual Ontarians and strengthens communities. Ending chronic homelessness is a collective commitment to equity, resilience, and a future where everyone has the opportunity to thrive.



Addressing Chronic Homelessness is not only a Moral Imperative

BUT ALSO A MATTER OF PUBLIC HEALTH,
COMMUNITY SAFETY, EQUITY, AND
ECONOMIC SUSTAINABILITY.

Technical Notes

1.1: People Experiencing Homelessness

Data Sources and Collection

The data used to estimate the total number of people experiencing homelessness from 2016 to 2024 was based on 205 data points submitted by Ontario's 47 service managers, out of a total of 423 possible data points (47 service managers × 9 years). Data was drawn from a variety of sources described below.

- By-Name Lists: Comprehensive records of people experiencing homelessness.
- Emergency shelter records: Data from shelters capturing usage patterns.
- Point-in-Time (PiT) counts: One-day snapshots of homelessness in communities.
- Other supplementary reports: Regional- and service-level documentation.

Data Completion

The dataset on people experiencing homelessness in Ontario reflects data collected in 2024, but represents trends spanning 2016 to 2024. While all 47 service managers contributed data in 2024, the earlier years (2016–2019) rely on retrospective data representing fewer service managers and covering a smaller portion of the provincial population. For example, data representing 2016 came from 21 service managers, covering just 13% of Ontario's population, and by 2019, that increased to 24 service managers covering 63% of the population. Those earlier years may reflect undercounts or inconsistencies due to limited data availability and incomplete reporting.

From 2020 onward, data quality improved significantly, with service manager participation rising to 41 (73% population coverage) in 2020 and all 47 service managers contributing in 2022, achieving full provincial population representation. These improvements make data from 2020 onwards more reliable for identifying trends and informing decision-making.

Estimation and Standardization Process

The estimates, spanning 2016 to 2024, were derived as described below:

- 35%: Annual data submitted directly
- 14%: Converted into annualized estimates
- 6%: Manually estimated using desk research
- 46%: Projected through linear regression or, for 2024 data, projecting to year-end

Where gaps existed, publicly available information and additional research supplemented the dataset. Standardization was applied to improve consistency and comparability across all regions and years.

1.2: Chronic Homelessness

Data Sources and Collection

Data on chronic homelessness was submitted by Ontario's 47 service managers for 2024, with reduced participation in earlier years.

- **2024:** All 47 service managers participated.
- **2023 and 2022:** 46 service managers contributed data.
- **2021:** 36 service managers provided data.
- **2019:** Only 15 service managers contributed, covering 51% of the provincial population.

The dataset primarily includes by-name lists, emergency-shelter records, and demographic data submitted by service managers. Eighty-six percent of people reported as experiencing chronic homelessness were identified using the federal definition. Twelve percent were identified using the provincial definition, while 2% were based on other or unspecified definitions.

Estimation and Standardization Process

Annual estimates of chronic homelessness were calculated by applying the weighted average for all service managers to the total number of people experiencing homelessness each year. For instance, in 2024, the weighted chronic-homelessness rate of 51% was applied to the estimated 81,515 people experiencing homelessness.

Rates reported by service managers were aggregated to calculate the estimated number of chronically homeless people across the province for priority populations as follows:

REFUGEES AND ASYLUM SEEKERS

Data for 2024 was reported by 21 service managers, with 8 reporting zero people. Missing values for 2024 were filled using desk research, with one missing value carried forward from 2023. All remaining missing values for 2024 were set to zero to avoid overestimation.

All service managers who reported more than 10 people in 2024 also provided data back to 2019. All remaining missing values were set to zero for 2023-2019.

IMMIGRANTS

Data for 2024 was reported by 21 service managers, representing 38% of the total population. Data coverage was approximately 30% for earlier years back to 2020. Missing values were not filled due to limited reliability.

INDIGENOUS POPULATIONS

Data for 2024 was reported by 38 service managers, covering 76% of the provincial population. Coverage was 63% in 2021 and dropped to 33% in 2020. Missing values were not imputed for earlier years due to limited reliability.

AGE

Age was reported by 36 service managers in 2024, representing 74% of the total population. While most service managers used consistent age groupings, minor variations were noted.



1.3: Homelessness-Serving System

Emergency Shelters

- Emergency shelters include permanent beds, cold weather shelters, temporary crisis shelters, overflow accommodations, hotel/motel “up-to” beds, and domestic violence shelters. Some service managers noted that Violence Against Women (VAW) shelter beds were excluded.
- An estimated 15,990 emergency shelter beds were reported for 2024. Data was collected from 42 service managers, with 2 indicating no beds. Based on desk research, data for three additional service managers was manually input, and two service managers required adjustments using notes from service managers.
- Historical data gaps were supplemented with public sources, such as Statistics Canada’s Shelter Capacity Online Reports (2017–2020), which provide permanent bed counts. Missing data for 2021–2023 was addressed using related datasets for counts by Census Subdivision (CSD).
- For 2024, 20 service managers reported 268 non-funded beds, representing 12.5% of the reported funded beds and indicating an assumption of 10% non-funded beds to be applied in scenario modelling.

Transitional Housing

- Transitional housing provides temporary, time-limited housing with support services, typically lasting 3 months to 3 years, with the goal of transitioning people to permanent housing.
- For 2024, 36 of 47 service managers reported transitional housing capacity, totalling 3,168 beds. Data gaps were addressed as follows:
 - One service manager categorized transitional housing beds under emergency shelters; adjustments were made based on publicly available data.
 - Another grouped transitional housing beds under supportive housing; desk research did not yield reliable results to fill this gap.
 - One service manager's data was estimated using Statistics Canada's shelter data.
 - Based on Statistics Canada's data and research, eight service managers were confirmed to have no transitional housing beds.
- Using a 90% system coverage rate (based on emergency shelters), the estimated total for transitional housing in 2024 was adjusted to 3,520 beds.

Supportive Housing

- Supportive housing offers permanent, fixed-site housing with individualized, flexible support services for people with higher needs, such as mental-health challenges or substance-use.
- For 2024, 40 of 47 service managers reported supportive housing capacity, totalling 4,679 beds. Adjustments included:
 - Extrapolating data based on a median 80% system coverage rate reported by 22 service managers.
 - Using adjusted totals, the estimated capacity increased to 5,848 beds in 2024.
 - One larger service manager reported supportive housing spaces under RGI units.

Expenditure Data

Expenditure data was reported directly by service managers and reflects spending associated with homelessness programs. While expenditure data was among the most reliable collected, certain limitations and nuances were noted.

Unspecified Programs: Some service managers reported expenditures without directly associating them with specific programs, particularly for temporary accommodations such as hotel/motel stays in place of emergency shelter beds.

Capital Expenditures: A few service managers included spending on housing units that were not yet operational, which is standard practice for infrastructure projects.

Data Adjustments: Expenditure data was reported as provided, except in limited cases where standard capital expenditures were included to ensure alignment with capacity reporting.

Expenditure data quality was highest in 2024, covering 45 service managers, with historical data extending back to 2016, when 37 service managers reported. Reporting improved consistently over time, with 47 service managers providing data in 2023 and 40+ service managers reporting from 2017 to 2022.

1.4: Homelessness-Serving System

RGI Waitlist Estimation

The adjusted estimate incorporates data from 43 reporting service managers, which recorded 232,419 households on the waitlist for 2024. To account for gaps, data from the remaining four service managers was estimated using the average 8.9% increase observed among those who reported for both 2023 and 2024. This adjustment yields an additional 35,822 households, bringing the total adjusted estimate to 268,241 households.

2.1: 2035 Homelessness Projections

Data Processing

The analysis integrates data from multiple sources:

- Service manager data-collection forms with total homelessness counts
- Census 2016 and 2021 data
- HART data
- CMHC data

These datasets were merged at the Census Subdivision (CSD) level, with CSDs aligned to each service manager's area of responsibility. The homelessness count data was linked with census features based on each area of responsibility.

Model training used 94 total observations, which represent the standardized data points remaining after applying the data-cleaning rules detailed in **Section 1.1: People Experiencing Homelessness**. Certain data points were excluded or replaced due to partial data coverage, period prevalence counts, or unclear count types to ensure data quality and consistency.

Statistical Model Details

Model Development and Training

To forecast homelessness in Ontario, we developed a linear regression model that was improved through using a variety of statistical techniques. This approach was chosen specifically for our relatively small dataset (n=94 observations), as it offered optimal predictive capability while maintaining interpretability. The model examined the relationship between People Experiencing Homelessness (PEH) as the dependent variable and multiple socioeconomic independent variables, including median household income, unemployment rates, and core housing needs.

Statistical Optimization Techniques

Principal Component Analysis and Ridge Regression Implementation

We employed ridge regression and Principal Component Analysis (PCA) to enhance model stability and prediction accuracy. These two techniques were particularly valuable given our dataset characteristics as they:

- Prevented overemphasis of individual predictors through regularization
- Mitigated multicollinearity between correlated variables (e.g., median income and core housing need)
- Reduced overfitting risk by balancing model complexity with predictive power
- Enhanced generalizability to new data through coefficient stabilization

Feature Selection Process

Backward elimination was used during feature selection by:

1. Starting with the full set of potential predictors
2. Iteratively evaluating each variable's contribution to model performance
3. Systematically removing variables with minimal predictive impact
4. Retaining statistically significant features

This process optimized model parsimony while maintaining predictive accuracy.

Dimensionality Reduction

To improve the accuracy of the model, Principal Component Analysis (PCA) was applied to:

- Convert correlated variables into uncorrelated principal components
- Preserve maximum variance in the transformed dataset
- Reduce computational complexity
- Further addressed multicollinearity concerns
- Maintain data structure while simplifying the feature space

Model Validation Framework

Cross-Validation Implementation

3-fold cross-validation was used to ensure robust model evaluation:

- Divided 94 observations into three equal partitions
- Training sets: 62-63 samples per fold
- Testing sets: 31-32 samples per fold
- Maintained consistent splitting patterns across iterations for reproducibility
- Averaged performance metrics across all folds

Performance Assessment

The model achieved an R-squared value of 0.9, indicating that our selected predictors explained 90% of the variance in homelessness counts. This performance level is particularly noteworthy in social science applications, where R-squared values above 0.70 are typically considered strong. However, we acknowledge several important considerations identified below.

1. Model Strengths:

- High R-squared
- Robust performance across validation folds
- Strong predictive capability for scenario analysis

2. Limitations and Considerations:

- R-squared alone doesn't capture all aspects of model performance
- Potential for overfitting despite regularization due to limited number of variables
- Generalization capabilities require ongoing validation
- Complex social factors may not be represented fully in data, effecting predictive power

Model Analysis

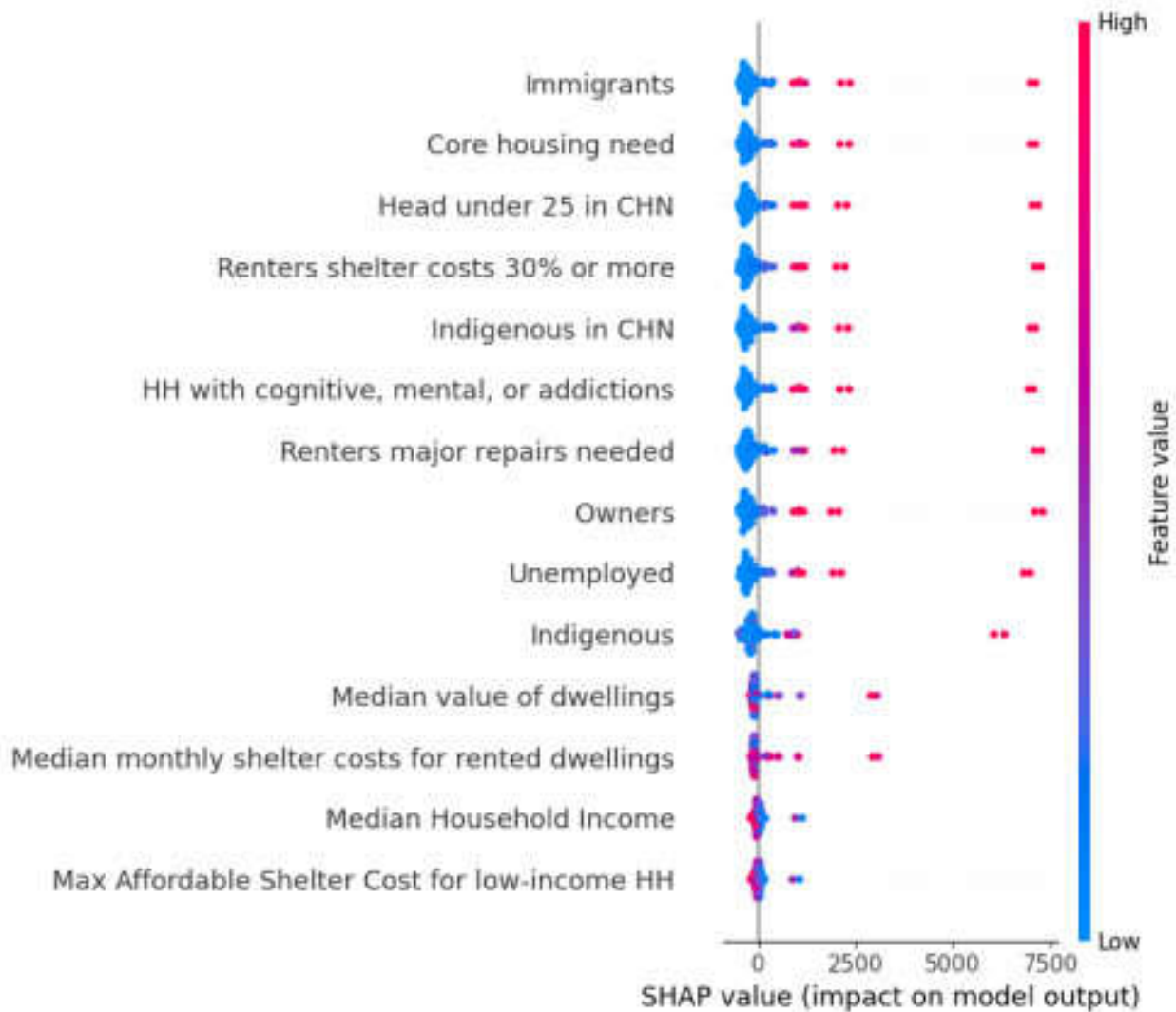
Coefficient Interpretation and SHAP Analysis

The model employs two complementary approaches to understanding variable importance: regression coefficients and SHAP (SHapley Additive exPlanations) values. The coefficients quantify the direct relationship between each independent variable and homelessness counts, while SHAP values provide a visual representation of each variable's contribution to the projection.

Variable Impact Categories

Based on both coefficient magnitude and SHAP analysis distributions (measured in impact units from 0-7500), variables were categorized into four distinct impact levels.

Figure 34: SHAP Analysis of Variables Impacting Housing Outcomes



01

High Positive Impact

Features like immigrant population, core housing need, youth under 25 in core housing need (CHN), and renters with shelter costs exceeding 30% of income are the strongest drivers of our projections. Their coefficients indicate a significant positive relationship with the homelessness count, meaning that as these values increase, homelessness is predicted to rise.

SHAP analysis reinforces this finding, showing a large spread of SHAP values for these features, which indicates their substantial contribution to model predictions.

02

Moderate Positive Impact

Factors like rented units needing major repairs, unemployment, and homeownership also exhibit positive relationships with homelessness, but their effects are relatively smaller compared to the variables with a high positive impact. The SHAP plot shows moderate value spreads for these variables, emphasizing their secondary yet important roles.

03

Negative Impact (Protective Factors)

Variables such as median household income and maximum affordable shelter cost for low-income households demonstrate a negative relationship with homelessness. This suggests that increases in either income or affordable housing measures can reduce homelessness. The SHAP plot visually confirms this by showing that higher values for these features are associated with decreases in homelessness predictions.

04

Mixed Effects

Variables like median monthly shelter costs for rented dwellings and median dwelling value show varied effects, depending on specific conditions. While these factors are relevant, their influence is less pronounced than positive and negative drivers.

SHAP Distribution Analysis

The SHAP analysis reveals:

- Feature value ranges of 0-7500 impact units
- Clustering patterns in impact distribution
- Interaction effects between variables
- Regional variation in impact magnitude

Economic Scenarios

The model incorporates three distinct economic trajectories to project homelessness outcomes, each with specific variable assumptions and regional considerations.

Economic Steady Scenario

1. Immigration

- Steady growth following historical trends
- Initial moderation due to study visa/work permit reductions
- Stabilization influenced by effects of United States policies

2. Economic Indicators

- Unemployment: Initial decrease with inflation stabilization, followed by steady state
- Median Household Income: 1-2 year decline, then stabilization and modest growth
- Core Housing Need: Growth aligned with population increase, minimal rate

3. Housing Market Variables

- Shelter Costs: Continued rise following historical patterns, smoother trajectory
- Property Values: Steady growth with interest rate stabilization
- Rental Affordability: Initial stagnation, gradual improvement with income recovery

4. Demographic Factors

- Indigenous Population: Stable provincial growth with regional variation
- Households with Cognitive/Mental Health/Addiction Challenges: Growth rate parallel to core housing need
- Youth Under 25 in Core Housing Need: Stable increase aligned with population growth



Economic Downturn Scenario

1. Economic Pressure Points

- Unemployment: Persistent elevation with limited recovery
- Household Incomes: Initial decline, long-term stagnation
- Core Housing Need: Accelerating growth pattern

2. Housing Market Stress

- Shelter Costs: Early spike, later market adjustment
- Property Values: Sharp initial decline, slow recovery
- Affordability Metrics: Progressive deterioration

3. Vulnerability Factors

- Mental Health Challenges: Increased growth rate
- Housing Insecurity: Compounding effects
- Support-System Strain: Elevated pressure

Economic Upturn Scenario

1. Economic Strengthening

- Unemployment: Steady decrease through the scenario period
- Household Incomes: Consistent growth across industries
- Core Housing Need: Initial modest growth, later stabilization

2. Market Improvements

- Shelter Affordability: Progressive improvement
- Housing Costs: Stable, manageable growth
- Property Values: Consistent appreciation without sharp fluctuations

3. Social Indicators

- Support-Service Access: Enhanced
- Vulnerability Factors: Stabilizing trends
- Cost-Burden Ratios: Gradual improvement

3.1: Modelling Solutions to Chronic Homelessness

Turnover and Negative Exit Assumptions

The model incorporates assumptions about turnover and negative exit rate to guide capacity planning for new spaces in the homelessness-serving system. Turnover rates represent the percentage of participants transitioning out of programs annually, while negative exit rates capture the percentage of participants leaving programs without achieving stable housing outcomes.

Turnover Rates:

- Higher turnover rates, such as 250% for Prevention/Diversion programs, reflect the short-term nature of these interventions and their ability to serve multiple clients within a year.
- Lower turnover rates, such as 10% for Subsidized Housing, reflect the longer-term stability these programs are designed to provide.

Negative Exit Rates:

- These rates vary by program type based on the intensity and objectives of the service. For example:
 - Supportive Housing: 10% negative exit rate, as intensive supports aim to minimize failures.
 - Transitional Housing: 20% negative exit rate, acknowledging the inherent challenges in short-term interventions.

Table 24: Turnover and Negative Exit Rates

Program Type	Turnover Rate	Negative Exit Rate
Rent Supports	20%	5%
Prevention/Diversion	250%	10%
Subsidized Housing	10%	5%
Housing and Case Management	20%	10%
Transitional Housing	100%	20%
Supportive Housing	20%	10%

Considerations

TARGETS AND
RECALIBRATION

These rates are initial targets and may need adjustment as more robust data becomes available. Continuous monitoring and evaluation will be essential to ensure the assumptions align with real-world program performance.

PROGRAM
DURATION

Turnover rates reflect program durations, with short-term programs like Prevention/Diversion having higher turnover compared to long-term supports like Subsidized Housing.

NEGATIVE EXIT
CHALLENGES

Lower negative exit rates are achievable with strong program supports, but may require additional investments in case management and follow-up services to prevent homelessness recurrence.

Cost Assumptions

The model estimates capital and operational costs based on standardized per-unit calculations. These estimates provide a foundation for understanding the financial investments required to meet the projected demand for housing and support services.

Capital Costs

The following estimates outline the per-space investment needed to develop key program types.

- Supportive Housing: \$250,000 per space.
- Subsidized Housing: \$185,000 per space.
- Transitional Housing: \$100,000 per space.

Operational Costs

The yearly operational costs per space account for program delivery, including activities such as rent subsidies, case management, and landlord liaison services.

- Supportive Housing: \$30,000 per space annually
- Subsidized Housing: \$8,500 per space annually
- Housing and Case Management: \$42,000 per space annually
- Prevention/Diversion Programs: \$5,000 per space annually

Considerations

OPERATIONAL COSTS

These are calculated per caseload space, and include all relevant program costs. For example, housing and case management costs encompass rent supports, caseworker salaries, and landlord liaison services.

REGIONAL VARIABILITY

Costs may vary significantly across regions due to differences in local markets, household sizes, and program delivery models. For example, urban areas with higher construction costs may exceed the average capital estimates.

FUTURE CALIBRATION

These estimates are broad averages and will require adjustment as more robust data becomes available on actual capital and operational expenditures.

INTEGRATED COST APPROACH

Certain programs, such as Prevention/Diversion, reflect a mix of interventions that include early-stage engagement activities, which may differ in intensity and cost compared to more resource-intensive services like Supportive Housing.

Growth Projections and Target Population Assumptions

The model assumes population growth across different chronicity levels and aims for 100% coverage of need to achieve functional zero homelessness. These assumptions reflect conservative yet optimistic projections, accounting for systemic risks, macroeconomic pressures, and ongoing interventions.

Growth Projections by Chronicity

The model projects annual growth rates for populations based on chronicity levels:

- High and Moderate Chronicity: 16% annual growth, reflecting reduced rates from previous years (30%).
- Emerging and No Chronicity: 8% annual growth, recognizing ongoing risks and systemic pressures.

Considerations

While these projections are optimistic, several risk factors could influence actual growth rates:

MACROECONOMIC SHOCKS

Recessions, inflation, and housing-market instability could increase homelessness rates.

EMERGING CHALLENGES

New drug crises, changing immigration patterns, or failures in upstream systems like healthcare and justice could exacerbate homelessness.

SYSTEMIC GAPS

Insufficient upstream interventions in areas such as poverty reduction, mental health, and addiction services may lead to higher inflow into homelessness.

Target Population Coverage

The model targets 100% of demand across all chronicity levels, aiming for functional zero homelessness by addressing populations at all stages of housing instability.

Table 25: Target Population Coverage by Chronicity Level

Chronicity Level	Target % of Demand
High Chronicity	100%
Moderate Chronicity	100%
Emerging Chronicity	100%
No Chronicity	100%

Considerations

OPTIMISTIC ESTIMATES

These assumptions reflect the model's goal of fully meeting demand, but may need recalibration based on real-world conditions.

SYSTEMIC RISKS

Addressing chronicity requires a multi-system response, including upstream investments in health, financial supports, and justice systems to mitigate homelessness inflow.

SCALABILITY & FLEXIBILITY

The ability to adapt to unexpected pressures, such as economic shocks or population changes, will be critical to achieving these targets.

Acuity Level Distributions and Matching Program Components

The model uses acuity levels to guide resource allocation and program design, ensuring that people receive the appropriate level of support based on their specific needs. Acuity levels—high, moderate, and low—reflect the complexity of people's circumstances and the intensity of the supports required. Matching program components to these levels enables a targeted and efficient use of resources.

Table 26: Acuity Level Distributions by Chronicity

Chronicity Level	High Acuity	Moderate Acuity	Low Acuity	Total
High Chronicity	70%	30%	0%	100%
Moderate Chronicity	50%	30%	20%	100%
Emerging Chronicity	10%	20%	70%	100%
No Chronicity	5%	15%	80%	100%

Matching Program Components to Acuity Levels

Each acuity level is matched to program components that address the specific intensity of support required.

- High-acuity people with chronic and complex needs require intensive, long-term programs such as supportive housing and housing and case management.
- Moderate-acuity people benefit from transitional and medium-intensity programs to stabilize and transition to independence.
- Low-acuity people are best supported through housing solutions that provide minimal but essential assistance, such as Subsidized Housing and Prevention/Diversion programs.

3.2 Modelling a \$2 Billion Investment

Acuity Level Distributions and Program Allocations

The model aligns investments with acuity levels and chronicity distributions to optimize resource allocation and program delivery. This approach ensures that people receive appropriate levels of support based on their needs. The following table illustrates the proportional use of program components across acuity levels.

Table 27: Distribution of Program Components Across Acuity Levels

Acuity Level	Program Component	% Used
High Needs	Supportive Housing	100%
	Housing and Case Management	90%
	Transitional Housing	60%
	Subsidized Housing	15%
	Rent Assistance	15%
	Prevention/Diversion	7%
Moderate Needs	Housing and Case Management	10%
	Transitional Housing	40%
	Subsidized Housing	20%
	Rent Assistance	25%
	Prevention/Diversion	13%
Low Needs	Subsidized Housing	65%
	Rent Assistance	60%
	Prevention/Diversion	80%

Acuity and Chronicity Distributions

The model incorporates assumptions about the distribution of acuity levels within each chronicity category to guide program design and resource allocation.

Table 28: Codistribution of Chronicity and Acuity Levels

Chronicity Level	High Acuity	Moderate Acuity	Low Acuity	Total
High Chronicity	70%	30%	0%	100%
Moderate Chronicity	50%	30%	20%	100%
Emerging Chronicity	10%	20%	70%	100%
No Chronicity	5%	15%	80%	100%

Matching Program Components to Needs

The model prioritizes resource allocation to ensure program components are matched to acuity levels:

HIGH SUPPORT NEEDS

Supportive Housing (85%),
Housing and Case Management
(75%), Transitional Housing (75%),
Prevention/Diversion (35%).

MODERATE SUPPORT NEEDS

Transitional Housing (25%), Housing
and Case Management (25%),
Prevention/Diversion (65%).

LOW SUPPORT NEEDS

Rent Assistance (100%), with
minimal reliance on other intensive
services.

Growth Projections and Demand Targets

The model projects annual growth across chronicity levels, reflecting ongoing challenges and systemic pressures.

Table 29: Projected Growth Across Chronicity Levels

Chronicity Level	Yearly Growth	Target % of Demand
High Chronicity	16%	40%
Moderate Chronicity	16%	10%
Emerging Chronicity	8%	5%
No Chronicity	8%	0%

Cost Assumptions

The model incorporates detailed operational cost estimates to inform budget planning and funding requirements.

Table 30: Cost Estimates for Program Components

Program Component	Capital Cost	Annual Operational Cost
Supportive Housing	\$250,000	\$40,000
Housing and Case Management	Not applicable	\$42,000
Transitional Housing	\$185,000	\$30,000
Prevention/Diversion	Not applicable	\$7,000

References

1 “Fifty Years in the Making of Ontario’s Housing Crisis: A Timeline,” Housing Rights Canada, accessed December 3, 2024 <https://housingrightscanada.com/fifty-years-in-the-making-of-ontarios-housing-crisis-a-timeline/>

2. Maytree. Modernizing Core Housing Need: Why the Key Indicator in Canadian Housing Policy Needs a Refresh. Sam DiBellonia and Garima Talwar Kapoor, March 2023. Retrieved from <https://maytree.com/wp-content/uploads/Executive-Summary-Modernizing-Core-Housing-Need-Final.pdf>

3. Advocacy Centre for Tenants Ontario (ACTO) and Advocacy North. North at Home: Understanding Affordable Housing in Northern Ontario. Available at: https://epdpdscrmssa01.blob.core.windows.net/cmhcprodcontainer/sf/project/archive/research_6/rr_north-at-home.pdf.

4. Government of Canada. Youth Homelessness in Canada: 2024 Report. Housing and Infrastructure Canada. Accessed December 3, 2024. <https://housing-infrastructure.canada.ca/homelessness-sans-abri/reports-rapports/youth-homelessness-2024-itinerance-jeunes-eng.html>.

5. In this context, “stasis” refers to a state of dynamic equilibrium within the homelessness response system. It means the system is continuously adjusting, so that any new instances of homelessness are quickly addressed and resolved before they lead to prolonged instability. In other words, the overall number of people experiencing homelessness remains relatively steady because the system has the capacity to both help those who need assistance and prevent long-term homelessness from becoming established.

6. Thistle, J. (2017). Definition of Indigenous Homelessness in Canada. Toronto: Canadian Observatory on Homelessness Press.

This is Exhibit "G" referred to in the Affidavit of Peter Sweeney affirmed by Peter Sweeney of the City of Cambridge, in the Regional Municipality of Waterloo, before me at the City of Toronto, in the Province of Ontario, on June 6, 2025 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits (or as may be)

GRETA HOAKEN

100 Victoria Street North Encampment: Major Incident
(Sudden Death) Summary

MAJOR INCIDENT NOTIFICATION

Corporate Security

Date and Time:	December 18, 2024 @ 0017
Call Type:	Sudden death
Location:	Echo 1 (100 Victoria)
Reported by:	On site guard ()
Involved/Responding Security:	, onsite guards
Involved Subject:	)
Injuries:	Deceased
Description of Event:	Security found an unresponsive male resident 0017hrs- WRPS and EMS on site. WRPS currently investigating. 0040hrs- Resident confirmed deceased. EMS off site. 0041hrs- M3 on site to assist. WRPS has placed caution tape. 0101hrs - Forensics on site. 0136hrs- Forensics off site. 0153hrs -WRPS informed Security that WRPS will not be IDing the Resident tonight. WRPS is now waiting on body removal.

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	0201hrs - M3 off site. 0222hrs - Body removal on site. 0232hrs - Body removal off site and transporting the Resident. 0237hrs - 927 off site. WA24-331449
Date and time event closed:	December 18 2024 @ 0240
Report to Follow:	yes

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MAJOR INCIDENT NOTIFICATION

Corporate Security

Date and Time:	Thursday, May 1 st , 2025, at 12:24hrs
Call Type:	Sudden Death
Location:	100 Victoria St N, Kitchener
Reported by:	On-site SECURITY
Involved/Responding Security:	S/G [REDACTED] S/S [REDACTED]
Involved Subject:	Unknown currently.
Injuries:	Deceased

Description of Event:	Medical emergency Onsite Security informed that a Subject overdosed and is now deceased. Security is contacting 927 1228hrs- EMS 2503, & 2187, 927 And KFD on site. EMS sup also on site. 1239hrs- Second 927 on site. 1241hrs- EMS off site. 1338hrs- Forensic on site. 1419hrs- Detectives on site 1457hrs- Corner on site 1516hrs: Coroner off site. 1518hrs - Coroner has stated to O/S that the SUBJECT has been deceased since 9am. 1523hrs: Detectives off site but they are at 87 Victoria speaking with someone. 927 is still onsite waiting for body removal 1617hrs: Body removal onsite 1622hrs - Corner services taken the body and WRPS are now offsite. WA25-107485
Date and time event closed:	Thursday, May 1st, 2025, at 16:25hrs
Report to Follow:	

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MAJOR INCIDENT NOTIFICATION

Corporate Security

Date and Time:	2025-04-20 @ 0623hrs/0825hrs
Call Type:	Sudden Death
Location:	Echo 1 – 100 Victoria
Reported by:	On site Security/WRPS
Involved/Responding Security:	On site Security
Involved Subject:	Unknown
Injuries:	Sudden Death via Overdose
Description of Event:	• This morning at approx. 0623hrs, EMS was contacted for an unresponsive male Subject experiencing an apparent overdose. EMS arrived on site and at approx. 0656hrs, EMS transported the Subject to hospital. • 0825hrs – WRPS arrived on site and spoke with on site Security informing that the male Subject was pronounced deceased at hospital and WPRS will be conducting an investigation on property. • 0931hrs – WRPS is off site and the investigation is concluded. WRPS stated that the ID of the deceased Subject is unknown. • Occurrence #WA25-097343 <u>No further Updates</u>
Date and time event closed:	2025-04-20 @ 0923hrs
Report to Follow:	No

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MAJOR INCIDENT NOTIFICATION

Corporate Security

Date and Time:	Saturday, August 17, 2024 @ 0634hrs
Call Type:	Suspected overdose turned to Sudden Death
Location:	Echo 1 (100 Victoria St N Kitchener)
Reported by:	Onsite SECURITY
Involved/Responding Security:	Onsite SECURITY, S/G [REDACTED] S/G [REDACTED]
Involved Subject:	Unknown Female Subject
Injuries:	Unknown
Description of Event:	- 0634hrs: Security on site observed a resident who did not appear to be doing well and contacted EMS for a well being check. EMS arrived on site and checked on the resident. When doing so, EMS realized there were two additional residents in need of EMS assistance. Paramedics contacted two additional units to attend. Paramedics transported three residents to the hospital for suspected overdoses. Police arrived on site and are speaking with Security. - 0836hrs: POLICE offsite - 1509hrs: WRPS Forensics arrived on site - WRPS Forensics informed onsite SECURITY that the female SUBJECT from overdose earlier in the morning is pronounced deceased. - 1518hrs: WRPS Forensics are taking photos of the area - 1538hrs: WRPS Forensics offsite
Date and time event closed:	August 17, 2024 @1538hrs

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 Barber Collins Security Shift Report Date: September 14 2023 	
SHIFT	0730-1930
Location:	100 Victoria St N
Shift Guard:	MOHAMMAD MALIK/IQBAL SINGH
TIME	NOTES:
0730	S/G [REDACTED] and S/G [REDACTED] arrived on site and relieved S/G G. [REDACTED] and S/G A. [REDACTED]. Received site phone, laptop, Radio, access card and car keys #207.
0800	Commenced patrol inside the encampment and near the bus stop across the street, counted tents to be 48 in total including 2 at the back of the EMS building with 0 collapsed tents, checked the washrooms, dirty. Checked the 70 Victoria street N plaza, all clear. Everything under control.
0900	Commenced patrol inside the encampment and near the bus stop across the street, checked washrooms, dirty. Checked the 70 Victoria street N plaza, all clear. Commenced patrol around Rumpel's fence line, checked the container lock, noticed graffiti on the container, informed dispatch.
1000	Commenced patrol inside the encampment, checked washrooms, dirty. Checked the 70 Victoria street N plaza, all clear. Everything under control.
1017	BY LAW on site
1100	BY LAW off site
1200	Commenced patrol inside the encampment, checked washrooms, dirty. Checked the 70 Victoria street N plaza, all clear. Commenced patrol around Rumpel's fence line, checked the container lock, all clear. Everything under control.
1230	One of the working staff members found a resident of the encampment, [REDACTED] deceased in [REDACTED] so they contacted EMS and S/Gs approached the situation as they saw the EMS and WRPS on site, EMS truck number- 2074, occurrence number WA-23-266501.
1634	WRPS off site with the deceased person.
1800	Commenced patrol inside the encampment, checked washrooms, dirty. Checked the 70 Victoria street N plaza, all clear. Commenced patrol around Rumpel's fence line, checked the container lock, all clear. Everything under control.
1900	Commenced patrol inside the encampment, recounted tents to be 48 in total including 2 at the back of the EMS building with 0 collapsed tents, checked washrooms, dirty. Checked the 70 Victoria street N plaza, all clear. Everything under control.
1930	Relieved by S/G G. [REDACTED] & S/G A. [REDACTED] handed over the site equipment – phone, laptop, radio, access card, and car keys #207. OFF DUTY.
Page	1 of 1
Signature	[REDACTED]

This is Exhibit "H" referred to in the Affidavit of Peter Sweeney affirmed by Peter Sweeney of the City of Cambridge, in the Regional Municipality of Waterloo, before me at the City of Toronto, in the Province of Ontario, on June 6, 2025 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits (or as may be)

GRETA HOAKEN

100 Victoria Street North Encampment: Major Incident (Fire) Summary

MAJOR INCIDENT NOTIFICATION

Corporate Security

Date and Time:	June 25 th , 2024 at ~0547hrs
Call Type:	Fire
Location:	100 Victoria Street North
Reported by:	S/G [REDACTED]
Involved/Responding Security:	S/G [REDACTED]
Involved Subject:	Female VICTIM: [REDACTED] Female SUBJECT : [REDACTED]
Injuries:	Unknown
Description of Event:	O/S guard reported tent caught on fire and contacting 911. 0547hrs- WRPS on site. 0550hrs - KFD #A12, #P12 and #T13 on site. 0500hrs- KFD extinguished fire. 0557hrs- O/S guard reported female resident Intentionally started the fire on another female resident's tent. WRPS initiated 949. 0620hrs- KFD off site. 0625hrs- WRPS has SUBJECT in custody and speaking with them on site. 0636hrs- WRPS off site with SUBJECT.

	WA-24-165674
Date and time event closed:	June 25 th , 2024 at ~0636hrs

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MAJOR INCIDENT NOTIFICATION

Corporate Security

Date and Time:	November 21, 2024 at ~1131hrs
Call Type:	Fire
Location:	100 Victoria Street North
Reported by:	O/S Guard
Involved/Responding Security:	O/S Guard, S/S [REDACTED]
Involved Subject:	Unknown at this time
Injuries:	No

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Description of Event:	1131hrs- O/S guard reported fire on site. KFD #P12 and #A12 on site to extinguish the fire. 1135hrs- O/S guard reported a propane tank burst, but unsure what happened. 1137hrs- Fire is no longer active. 1138hrs- S6 en route. 1147hrs- KFD off site. 1149hrs- WRPS on site. 1155hrs- Fire prevention on site. 1215hrs- WRPS and Emergency services off site. WA-24-307505
Date and time event closed:	November 21, 2024 at ~1215hrs
Report to Follow:	No

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MAJOR INCIDENT NOTIFICATION

Corporate Security

Date and Time:	January 19, 2015 @2314
Call Type:	Fire
Location:	Echo 1 – 100 Victoria

371

Reported by:	Onsite guard
Involved/Responding Security:	██████████
Involved Subject:	Unknown
Injuries:	No
Description of Event:	Guard advised of a fire on site. Upon a quick CCTV review it appears something exploded, and the fire spread quickly. 2320hrs- Kitchener fire department on site. 2324hrs- Fire is being put out. 2325hrs- WRPS on site. 2330hrs- WRPS leaving property. 2348hrs- allegedly and electrical appliance cause fire. Fire is extinguished all 10-4 WA25-016646
Date and time event closed:	January 19, 2025 @ 2348
Report to Follow:	yes

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MAJOR INCIDENT NOTIFICATION

Corporate Security

Date and Time:	Monday April 28 th , 2025 at ~ 1012hrs
Call Type:	Fire

Location:	100 Victoria Street North- Echo 1
Reported by:	O/S Guard
Involved/Responding Security:	O/S Guard
Involved Subject:	Unknown
Injuries:	Not reported
Description of Event:	• O/S guard reported a fire inside the bins on property and have contacted the fire department. • 1017hrs- Fire department #P18 on site. • Fire department has extinguished the fire and WRPS is on site. It was reported to be caused from matches thrown in the garbage bin. WA-25-104470 **END OF INCIDENT**
Date and time event closed:	Monday April 28 th , 2025 at ~ 1040hrs
Report to Follow:	No ROWA-2025-050270

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This is Exhibit "I" referred to in the Affidavit of Peter Sweeney affirmed by Peter Sweeney of the City of Cambridge, in the Regional Municipality of Waterloo, before me at the City of Toronto, in the Province of Ontario, on June 6, 2025 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits (or as may be)

GRETA HOAKEN

100 Victoria Street North Encampment: Major Incident
Summary

MAJOR INCIDENT NOTIFICATION

Corporate Security

Date and Time:	September 8th, 2024 @ 1108hrs
Call Type:	Physical Altercation – Offensive Weapon
Location:	Echo 1 (100 Victoria St N Kitchener)
Reported by:	Onsite SECURITY
Involved/Responding Security:	Onsite SECURITY
Involved Subject:	Unknown
Injuries:	No
Description of Event:	• O/S guard advised dispatch that they have contacted WRPS as there was a disturbance between 2 residents where the one resident had a baseball bat. The bat has been put away been put away and the situation has deescalated but O/S Security want WRPS to attend. • 1109hrs – WRPS on site • 1114hrs – WRPS conducted an arrest on an involved Subject. • 1148hrs – WRPS will be remaining on site for the time being. • 1211hrs – WRPS has left site and everything is 10-4.

	<u>Nothing Further to Report</u>
Date and time event closed:	2024-09-08 @ 1211hrs

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MAJOR INCIDENT NOTIFICATION

Corporate Security

Date and Time:	December 17, 2024 at ~2000hrs
Call Type:	Assault
Location:	100 Victoria Street North
Reported by:	O/S Guard
Involved/Responding Security:	O/S guard
Involved Subject:	Unknown SUBJECT VICTIM: [REDACTED]
Injuries:	No

376

Description of Event:	2000hrs- O/S guard contacting EMS for resident as they reported they were punched by another resident and requesting to be checked. Resident does not appear to have any physical injuries. 2017hrs- WRPS and EMS on site 2026HRS- WRPS off site. SUBJ is not being transported to hospital and does not wish to press charges.
Date and time event closed:	December 17, 2024 @2031
Report to Follow:	Yes

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MAJOR INCIDENT NOTIFICATION

Corporate Security

Date and Time:	April 1 st , 2024 at ~2224hrs
Call Type:	Offensive Weapon
Location:	100 Victoria Street North- Echo 1
Reported by:	S/G [REDACTED]
Involved/Responding Security:	S/G [REDACTED]

377

Involved Subject:	Unknown
Injuries:	No
Description of Event:	On site guard advised that an Unknown Male approached them, and stated someone walked up to them and pointed a gun at them. The Male wanted security to call police. On site security called police, who arrived on site. As soon as police arrived on site, the Subject ran off property. Police are checking the area. 2232hrs- WRPS checked area and nothing found, WRPS off site. WA-24-084240
Date and time event closed:	April 1 st , 2024 at ~2232hrs

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MAJOR INCIDENT NOTIFICATION

Corporate Security

Date and Time:	April 8 th , 2024 @ 0845
Call Type:	Offensive Weapon
Location:	100 Victoria – Echo 1
Reported by:	O/S SECURITY
Involved/Responding Security:	O/S SECURITY
Involved Subject:	Unknown

Injuries:	N/A
Description of Event:	• Onsite SECURITY reported a Male SUBJECT on the property was reportedly wandering around the site with a Knife Brandished in his possession. • SECURITY contacted POLICE for a check well being. • 0854hrs - POLICE is onsite speaking with SUBJECT. • 0905hrs – POLICE offsite, upon speaking to SUBJECT no knife was observed. • Occurrence # WA24-089831
Date and time event closed:	April 8 th , 2024 @ 0903

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MAJOR INCIDENT NOTIFICATION

Corporate Security

Date and Time:	July 12, 2024 @1748hrs
Call Type:	Offensive Weapon
Location:	100 Victoria St (Echo 1)
Reported by:	On site Security
Involved/Responding Security:	On site Security
Involved Subject:	Unknown male
Injuries:	No injuries

379

Description of Event:	• Security guards on site called to advise that there is a Subject walking around with a large knife in his hand. Guards on site contacting Police. • 1749hrs – Security reported that the Subject has gone back inside one of the tents in the Encampment. • 1749hrs – Police arrived on site. • 1751hrs – Police and Security have gone over to speak with the individual. • 1752hrs – Additional Police unit on site. • 1755hrs – Six (6) Police officers now on site speaking with some of the residents in the centre of the Encampment. • 1806hrs – Police learned that the Subject who was holding the knife ran off property prior to Police arriving on site. WA24-182952
Date and time event closed:	July 12, 2024 @1806hrs

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MAJOR INCIDENT NOTIFICATION

Corporate Security

Date and Time:	July 12, 2024 @ 1444hrs
Call Type:	Offensive Weapon
Location:	100 Victoria (Echo1 Encampment)
Reported by:	██████████
Involved/Responding Security:	██████████ On site Security guards for the Encampment
Involved Subject:	Unknown male
Injuries:	No injuries

Description of Event:	• A/S H1 contacted Security Operations Centre to advise that he believes he observed a male Subject inside the Encampment who is in possession of a firearm. SOC advised A/S H1 to contact Police and SOC would begin reviewing CCTV. Subject described as a black male, wearing all black clothing and black shoes. • 1453hrs – Police on site. • 1454hrs – Police placed the Subject under arrest. • 1505hrs – Police searched the Subject and did not locate a firearm. • 1514hrs – Object has been confirmed to be a piece of metal that is in the shape of a handgun. Everything is 10-4. Police have released the Subject back onto property. • WA24-182775
Date and time event closed:	July 12, 2024 @ 1518hrs

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MAJOR INCIDENT NOTIFICATION

Corporate Security

Date and Time:	July 25 th 2024 @1450
Call Type:	Assault
Location:	100 Victoria
Reported by:	██████████
Involved/Responding Security:	██████████
Involved Subject:	Female- Black hat, White shirt, patterned pants (possibly checkered.)
Injuries:	None Reported

381

Description of Event:	• 1451hrs- A.S advises of an altercation that took place. Upon review it appears a female SUBJ began arguing with a male. The argument escalated and the female cased the male off property with a possible Knife. Male has gone to the St. Johns Soup Kitchen and is not injured. • 1452hrs- A.S advised that WRPS has been contacted as the female is still on property. • 1511hrs- female SUBJ is now standing in front of St. Johns Kitchen. • 1535hrs- WRPS on site • 1539hrs- WRPS talking to the SUBJ across the Street. • 1548hrs- WRPS off property. WA24-195279
Date and time event closed:	July 25, 2024 @ 1549

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MAJOR INCIDENT NOTIFICATION

Corporate Security

Date and Time:	2024-08-07 @ 0841hrs
Call Type:	Assault with a weapon
Location:	Echo 1 – 100 Victoria
Reported by:	On site Security
Involved/Responding Security:	On site Security

382

Involved Subject:	Unknown
Injuries:	Female Subject has a minor cut
Description of Event:	- On site Security contacted dispatch and advised that an unknown female Subject was assaulted by a male Subject armed with a “knife”. O/S Security contacted WRPS and the female Subject is waiting with Security until WRPS arrives. O/S guards stated the male Subject is inside one of the tents in the encampment. 0845hrs – WRPS on site. 0907hrs – WRPS has stated that the male Subject armed with the knife is off property and if they return, to call WRPS back to site as there are grounds to arrest. The female victim has been instructed to stay clear from site for the day. WRPS off site and everything on site is clear. 0943hrs – Security observed the male Subject return to property and WRPS is being contacted by on site Security. 0948hrs – WRPS on site. 0957hrs – WRPS has placed the Subject under arrest and have taken the Subject into custody. 1019hrs – WRPS is off site and has taken the Subject off site. - Occurrence #WA24-207309 <u>Nothing Further to Report</u>
Date and time event closed:	2024-08-07 @ 1020hrs

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MAJOR INCIDENT NOTIFICATION

Corporate Security

Date and Time:	December 15 th , 2023 @ 1532
Call Type:	Assault – Police Contacted

383

Location:	100 Victoria (Echo 1)
Reported by:	S/G [REDACTED] and S/G [REDACTED]
Involved/Responding Security:	S/G [REDACTED] and S/G [REDACTED]
Involved Subject:	Unknown
Injuries:	Yes, Cuts to Females Face and hands
Description of Event:	• 1536hrs-O/S Guard advised that Female SUBJECT was in a physical altercation with other SUBJECTS. Female SUBJECT was throwing items at SUBJECT and SUBJECT held Female on the ground until WRPS could be contacted by SECURITY. • 1535hrs-SUBJECT release Female and allowed them to get up • 1537hrs- WRPS onsite • 1538hrs- SUBJECT tried biting a Male SUBJECT and punched another SUBJECT. 949 by WRPS • 1542hrs- Fire Truck # P18 onsite • 1546hrs-EMS Truck # 2247 onsite • 1552hrs- Female SUBJECT will be taken by EMS to hospital, in WRPS custody • 1559hrs- 2nd EMS onsite • 1600hrs-EMS # 2247 Offsite, Transporting to GRH • 1602hrs- 2nd EMS off site • 1608hrs- WRPS offsite • Occurrence # WA23-354487
Date and time event closed:	December 15 th , 2023 @ 1608

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MAJOR INCIDENT NOTIFICATION

Corporate Security

Date and Time:	February 10 th , 2025, at 0849hrs

Call Type:	907 - Assault
Location:	Echo 1 – 100 Victoria St N
Reported by:	S/G [REDACTED]
Involved/Responding Security:	S/G [REDACTED] S/G [REDACTED]
Involved Subject:	1 UF Resident 1 UF Resident 1 UM Subject
Injuries:	Male Subject – Minor scratches on face
Description of Event:	0849hrs - Security reported a physical altercation between 2 female Residents and 1 male Non-Resident. - Security was able to de-escalate the altercation that the female Residents initiated. - The 2 female Residents have since gone into their tents and the male Subject has left property. - The female Residents reported no injuries. - The male Subject reported scratches on his face, but refused EMS and did not wish to involve 927 nor press charges. - Everything 10-4. NFTR.
Date and time event closed:	February 10 th , 2025, at 0849hrs
Report to Follow:	N/A

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MAJOR INCIDENT NOTIFICATION

Corporate Security

385

Date and Time:	Friday May 2 nd , 2025 at ~1841hrs
Call Type:	Disturbance with an Offensive Weapon
Location:	Echo 1- 100 Victoria Street North
Reported by:	O/S Guard
Involved/Responding Security:	O/S Guard
Involved Subject:	Matthew STEFANAC; Patrick BRADLEY
Injuries:	Not reported at this time
Description of Event:	• 1845hrs -O/S guard reported a fight involving two residents on the property. SECURITY witnessed Resident 1 M.S. on top of Resident 1 P.B. SECURITY separated the Residents, but noticed that M.S. had a Knife on their person. A member of FightBackKW intervened and advised SECURITY not to contact WRPS as the RESIDENTS were separated. SECURITY disengaged and contacted WRPS. • 1848hrs- WRPS on site. • 1849hrs- WRPS arrested the SUBJECT involved. • 1852hrs- EMS #2079 and KFD #P18 on site. • 1858hrs- KFD off site. • 1912hrs- EMS off-site. SUBJECT was not transported. • 1947hrs- WRPS moved to 84 Victoria Parking lot with SUBJECT in custody. • 2000hrs- WRPS is still in the area, with SUBJECT in custody. • 2145hrs– WRPS is off-site, and everything on site is 10-4. WA-25-108691 **No Further Updates**
Date and time event closed:	2025-05-02 @ 2145hrs

Report to Follow:	Yes

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This is Exhibit "J" referred to in the Affidavit of Peter Sweeney affirmed by Peter Sweeney of the City of Cambridge, in the Regional Municipality of Waterloo, before me at the City of Toronto, in the Province of Ontario, on June 6, 2025 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits (or as may be)

GRETA HOAKEN



This is Exhibit "K" referred to in the Affidavit of Peter Sweeney affirmed by Peter Sweeney of the City of Cambridge, in the Regional Municipality of Waterloo, before me at the City of Toronto, in the Province of Ontario, on June 6, 2025 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits (or as may be)

GRETA HOAKEN

Incident Type: Harassment and Violence

Incident Details

Employee Details

Employee Name:		Employment Type:	Full-Time
Employee ID:		Supervisor:	
Gender:	Female		
Department:	Housing and Support Providers (B)		
Top Department:	Housing Services		
Division:	Community Services		
Job Title:	Unsheltered Support Worker		
Time in Position:			
Hire Date:			
Employee Class:			

Incident Details

Date of Incident:	May 14, 2025	Country:	Canada
Time of Incident:	14:00	Equipment Involved:	
Date Employee Reported to Employer:	May 14, 2025	Date of Shift Start	May 14, 2025

Time Employee Reported to Employer:	14:14	on Date of Incident:	
Date of Incident Submission:	May 15, 2025	Time of Shift Start on Date of Incident:	07:30
Time of Incident Submission:	13:55	Shift Type:	Regular Scheduled Shift
Location of Incident:	Unknown	Scheduled Shift Length:	8.75
Incident Submitted By:	[REDACTED]	Overtime Shift:	☐ Yes ☒ No
		Please select which Joint Health and Safety committee (JHSC) or Health and Safety Representative (HSR) represents you:	[REDACTED]

Identify All People Involved

Role	Person/ Employee Name	Employee ID	Person Type	Phone #	Email	Supervisor
Employee	[REDACTED]	[REDACTED]	Involved Party	[REDACTED]		
Employee			Involved Party			
Employee			Witness			
Member of Public	[REDACTED]		Witness			
Member of Public	bystander		Involved Party			

Harassment and Violence

Conflict Categorization

Type of Conflict:

Both

Harassment and Violence Details

Did the situation involve physical violence?:	☐ Yes ☒ No
Were weapons involved?:	☐ Yes ☒ No
Is the aggressor an employee of the company?:	☐ Yes ☒ No
Did the situation involve harassment?:	☒ Yes ☐ No
Harassment:	Conduct,Comment Made
Harassment Type:	Verbal,Action Intended to Frighten/Coerce/Induce Duress
Is the aggressor a third-party to the company? (i.e. customer, patient, member of the public, etc.):	☒ Yes ☐ No
Type Of Third Party:	Client
Is there a risk of domestic violence to the employee?:	☐ Yes ☒ No
Has the aggressor been involved with any previous violent incidents with staff?:	☐ Yes ☒ No
Were the police summoned for this incident?:	☒ Yes ☐ No
Please Provide Occurrence Number:	unknown

Additional Details

Aggressor Identification:
David F.

Incident Type: Harassment and Violence

Incident Details

Employee Details

Employee Name:		Employment Type:	Full-Time
Employee ID:		Supervisor:	
Gender:	Female		
Department:	Housing and Support Providers (B)		
Top Department:	Housing Services		
Division:	Community Services		
Job Title:	Unsheltered Support Worker		
Time in Position:			
Hire Date:			
Employee Class:			

Incident Details

Date of Incident:	May 14, 2025	Country:	Canada
Time of Incident:	14:00	Equipment Involved:	
Date Employee Reported to Employer:	May 14, 2025	Date of Shift Start	May 14, 2025

Time Employee Reported to Employer:	14:14	on Date of Incident:	
Date of Incident Submission:	May 15, 2025	Time of Shift Start on Date of Incident:	07:30
Time of Incident Submission:	13:51	Shift Type:	Regular Scheduled Shift
Location of Incident:	Unknown	Scheduled Shift Length:	7
Incident Submitted By:	[REDACTED]	Overtime Shift:	☐ Yes ☒ No
		Please select which Joint Health and Safety committee (JHSC) or Health and Safety Representative (HSR) represents you:	[REDACTED]

Identify All People Involved

Role	Person/ Employee Name	Employee ID	Person Type	Phone #	Email	Supervisor
Employee	[REDACTED]	[REDACTED]	Involved Party		[REDACTED]	
Employee			Involved Party			
Employee			Involved Party			
Member of Public			Witness			
Member of Public	cannot be named-bystander		Witness			

Harassment and Violence

Conflict Categorization

Type of Conflict:

Harassment and Violence Details

Did the situation involve physical violence?:

☐ Yes ☒ No

Were weapons involved?:

☐ Yes ☒ No

Is the aggressor an employee of the company?:

☐ Yes ☒ No

Did the situation involve harassment?:

☒ Yes ☐ No

Harassment:

Conduct,Comment Made

Harassment Type:

Action Intended to Frighten/Coerce/Induce Duress,Verbal

Is the aggressor a third-party to the company? (i.e. customer, patient, member of the public, etc.):

☐ Yes ☒ No

Is there a risk of domestic violence to the employee?:

☐ Yes ☒ No

Has the aggressor been involved with any previous violent incidents with staff?:

☐ Yes ☒ No

Were the police summoned for this incident?:

☒ Yes ☐ No

Please Provide Occurrence Number:

unknown

Additional Details

Aggressor Identification:

David F.

THE REGIONAL MUNICIPALITY OF WATERLOO
Applicant

-and- PERSONS UNKNOWN AND TO BE ASCERTAINED
Respondents

Court File No. CV-25-00000750-0000

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT
WATERLOO REGION

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Lawyers for the Applicant,
The Regional Municipality of Waterloo

THE REGIONAL MUNICIPALITY OF WATERLOO
Applicant

-and-

PERSONS UNKNOWN AND TO BE ASCERTAINED
Respondents

Court File No. CV-25-00000750-0000

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PROCEEDING COMMENCED AT
WATERLOO REGION

**RESPONDING MOTION RECORD
OF THE REGIONAL MUNICIPALITY OF WATERLOO
(Volume 1 of 2)**

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