

Dear Regional Councillors,

I write to you today with concern regarding the Region's proposed amendments to the site-specific by-law regarding 100 Victoria.

From the beginning, this procedure has been flawed. Extending back to the lengthy court case resulting in the Valente decision in 2023, concerns about the constitutional rights of residents at 100 Victoria have continued to remain at the forefront of the issue. The Region's failure to engage in critical reflexivity has been a significant cause for concern over the past five years in regard to this issue in particular. Homelessness has seen a recorded sevenfold increase in Waterloo Region between 2018 and 2024, and although the lack of provincial support (and provincial hostility to the public good in general) has contributed substantially to this, the Region has done itself few favours in its ongoing austerity, under-investment in community services, and failure to properly engage with the protocols set out in the Plan to End Chronic Homelessness.

The Region adopted the Plan to End Chronic Homelessness in 2024, which also includes a framework for the development of plans and bylaws that insist on engaging with the affected communities when creating policy. None of this process was followed when pursuing the bylaw put forward in April of 2025. Numerous advocates rightfully chastised the Region for its failure to adhere to the framework, and further warned the Region of possible outcomes including additional litigation, costly court fees, wasteful allocation of resources, and unresolved issues of housing and homelessness. Sadly, and with little surprise, these have come to pass. Hence, the bylaw proposed in April of 2025 that would have resulted in the forced clearance of the site in December of 2025 has already faced court injunctions, failed mediation with Waterloo Region Community Legal Services, and is now facing additional litigation in February of 2026 at further cost to the Region while the housing issues and under-resourcing of community supports continues.

Regarding the immediate decision, the Region maintains in its proposed amendments to the site-specific bylaw that the term "resident" applies only to people on-site prior to April 16, 2025. This fails to consider the transient nature of unsheltered homelessness, and the reality that there are insufficient shelter spaces of emergency, transitional, affordable, supportive, or of other relevant nature to meet the need and demand in the Region. Not only does this bylaw fail to accommodate the residents as defined, it abdicates any responsibility to support any of the current residents (including those finding temporary alternatives to avoid lethally cold temperatures and conditions).

The Region's narrow view of resolving the presence of homeless community members at 100 Victoria is missing the bigger picture. With more than 1,000 individuals living unsheltered in the Region, and already insufficient amounts of shelter spaces, attention needs to be given to the subject of where unsheltered individuals are able, legally, to live. As of 2024, the Point in Time count (invariably an underestimate of the true number) for homelessness was 2,371 people for which there exist only (approximately) 650 emergency

and transitional shelter beds region-wide. The number of beds and shelter options is substantially fewer for women or genders other than male. Options are further limited by location, as the city of Cambridge was recently described by the Federal Housing Advocate as a “service desert”.

Until the Region can resolve these issues, it seems both inhumane and impossible to support the proposed amendments as they stand. I remain, for what it is worth as a resident in Waterloo Region, opposed to the bylaw as developed and introduced as well as the recently proposed amendments. Fortunately for me, as it stands, so does the legislature. I urge the Region to reconsider its position and seek a more fulsome and holistic approach to resolving its priorities at 100 Victoria.

Sincerely,

Kevin White  
Kitchener