



ATTN: Mayor Guthrie and Members of Council  
Guelph City Hall, 1 Carden Street  
Guelph, Ontario  
N1H 3A1

February 12<sup>th</sup>, 2024

Dear Mayor Guthrie and Members of Council,

This letter is to address "Recommendation 1" of the staff report that seeks approval for the draft Public Space Use By-law, 2024-76. Wyndham House is asking that council reject this bylaw, given the potential unintended harms that it could cause to individuals who are unhoused in our community.

The City of Guelph recently formally adopted a human-rights based approach to housing, and according to the National Housing Strategy, this includes: "principles of non-discrimination, inclusion, participation and accountability". This proposed Bylaw is in opposition to these principles, as it specifically discriminates against individuals who are unhoused and have no place to go, taking a punitive approach to solving a social problem. Taking a criminalized approach will not solve instances of chronic homelessness, and may serve to further marginalize and displace individuals, who already may not have anywhere safe to go. This could decrease access to needed health and support services, as well as housing-focused outreach supports, while displacing individuals to locations that may put them at greater risk.

Further to the principles of a human rights-based approach to housing, principles of inclusion and participation must be considered. In this case, individuals with lived experience and front-line workers addressing these problems, and local homelessness service providers were not consulted in the process of developing this bylaw. Therefore, it is not informed by live experience, and it did not allow for the participation of those who are most impacted by these decisions, those who are currently unsheltered.

From a data perspective, the Staff Report indicates that there are enough beds to support every individual who is in need of shelter in the City of Guelph, however this is not the case. The number of individuals who are currently chronically homeless, according to the local CMSM "By Name List" is 176. This number does not include non-chronically homeless individuals or individuals not captured on the By Name List, which means this number is higher. The current number of shelter beds across the system is approximately 148 (information obtained on February 9<sup>th</sup>, 2024 from HIFIS). Therefore, there are not enough shelter beds for everyone who is currently homeless. This data does not support the notion that all individuals in encampments have choice and are choosing to be in these locations over shelter, or that there is somewhere safe to go when being displaced.

Given that this By-law will cause harm to unsheltered individuals, that it is not aligned with a human-rights-based approach to housing, and that does not take into account a lack of available shelter beds to meet the need, Wyndham House would urge council to reconsider the adoption of this Bylaw. Instead, we would encourage continued collaboration with the CMSM and housing and health partners to implement the new resources provided by The Reaching Home funding to increase our capacity to respond with appropriate supports and shelter options to address the individual needs and current safety concerns. This approach will prevent the unintended harms as outlined above, promote safety and wellbeing for all, and ensure that there is a continued commitment to a human rights-based approach to housing.

  
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## WORKING TO PREVENT, REDUCE AND END YOUTH HOMELESSNESS

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