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Response to the Build Canada Homes – Market Sounding Guide (2025)

Introduction

The Intentional Community Consortium (ICC) is pleased to provide this submission in response to Infrastructure Canada’s **Build Canada Homes – Market Sounding Guide (2025)**. ICC is a national coalition of over 60 non-profit organizations working to solve the housing crisis for Canadians with intellectual and developmental disabilities. We share the federal government’s goal of delivering far more homes, far faster and at deeper levels of affordability^[1]. We believe **Build Canada Homes (BCH)** can be a transformative initiative to achieve this goal^[2], **if it is designed with inclusivity and support in mind**. In particular, it is critical that BCH explicitly include people with disabilities and their housing needs in its vision – a focus that is currently absent from the guide.

Our submission outlines ICC’s key concerns with the Market Sounding Guide and offers recommendations to ensure BCH fulfills its potential as a **truly inclusive, accessible, and supportive national housing program**. We emphasize the necessity of dedicated measures for people with developmental disabilities, integration of accessibility and safety standards (such as *Care Occupancy B3* fire code requirements), prioritization of inclusive housing in the use of federal lands, and the alignment of housing investments with support services. These recommendations align with ICC’s federal policy priorities and reflect the lived realities of the community we represent. Implementing them will help Canada meet its obligation to progressively realize the *right to housing* by prioritizing those in greatest need^[3] – a principle that unquestionably includes people with developmental disabilities.

About the Intentional Community Consortium (ICC)

The **Intentional Community Consortium (ICC)**, founded in 2017, is a registered not-for-profit coalition representing over 60 charities and non-profit agencies across Canada^[4]. Our members are dedicated to developing *inclusive, supportive housing* for individuals with intellectual and developmental disabilities (IDD). Together, we work to:

- **Advocate nationally** – speaking with a united voice to all levels of government for the urgent housing needs of people with developmental disabilities[5].
- **Scale up affordable supportive housing projects** – sharing knowledge and combining resources to create hundreds of new units across the country, typically in mixed-use, community-integrated developments of 20+ units or more[6][7].
- **Innovate in housing and support models** – leveraging partnerships (e.g. with health services, technology providers, and inclusive design experts) to pilot solutions that enable people with IDD to live with dignity and independence in the community.

ICC members include developmental service agencies, community living organizations, and supportive housing providers in provinces from coast to coast. Collectively, we bring decades of experience in creating housing that integrates affordability, accessibility, and support services for those with developmental disabilities – a population that has been chronically underserved by mainstream housing programs. Our mission is to ensure that national housing initiatives like Build Canada Homes address this gap and open doors for one of Canada’s most marginalized groups.

Key Concerns with the Market Sounding Guide

Despite its broad ambition, the Build Canada Homes guide lacks any explicit mention of people with disabilities or accessibility. ICC has identified several key concerns and gaps in the guide’s current approach:

- **Omission of Disability and Accessibility in the BCH Vision:** The Market Sounding Guide’s objectives discuss serving “*a diverse range of households, including low-income, working population, students, [and] seniors*”[8], yet nowhere does it acknowledge persons with disabilities. This absence is glaring – people with disabilities (including developmental disabilities) are among those most in need of affordable housing, often facing extreme housing precarity and exclusion. Past federal housing efforts that did not plan for accessibility (for example, Canada’s post-war housing programs) left a legacy of homes ill-suited to veterans and others with disabilities[9]. Eighty-five years later, we must not repeat that mistake. Failing to include disability explicitly at the design stage will perpetuate barriers and contradict Canada’s modern commitments to accessibility and human rights[10][11].
- **Dedicated Housing Funding for Developmental Disabilities:** In 2017, the National Housing Strategy included a historic carve-out of 2,400 units specifically for people with intellectual and developmental disabilities—an advocacy milestone led by ICC. Already, over 1,200 of those homes have been built or are under construction, giving thousands of Canadians access to safe, affordable, and supportive housing. This was an important start, but the need is far greater. Tens of thousands of individuals with developmental disabilities remain on waitlists or in inappropriate living situations, with projected waits stretching decades. Build Canada Homes must therefore maintain, expand, and make permanent this dedicated funding stream, ensuring it grows well beyond the initial 2,400 units and becomes a lasting pillar of Canada’s housing system. By doing so, the federal government can build on the progress achieved to date and ensure that this vulnerable population is no longer left behind.
- **Lack of Accessibility and Care Occupancy (B3) Standards:** The guide is silent on building code requirements for supportive housing, such as *Care Occupancy B3 fire code compliance* and universal design standards. These standards are not mere technicalities – they are lifesaving necessities for

housing people with disabilities. **Care occupancy (Group B3)** classification ensures enhanced fire and life safety measures (e.g. sprinkler systems, fire-rated separations, smoke alarms and emergency lighting) in residences for individuals who may need assistance to evacuate in an emergency[16]. However, applying these standards in community-based housing has been challenging. Many supportive housing projects are small-scale homes or retrofitted houses that, under current code exemptions, are *not required* to install sprinklers or other B3-level protections[17]. This regulatory gap poses real risks – fire safety should not depend on the size of the home when the occupants have high support needs. Likewise, Canada’s National Building Code still lacks comprehensive, up-to-date accessibility provisions for housing and exempts a wide range of smaller residential projects[18]. The Federal Housing Advocate has warned that these gaps are inconsistent with Canada’s obligations under the right to housing and the Accessible Canada Act[18]. **In practice, the absence of clear BCH requirements for accessibility and B3 compliance could lead to new housing that is unsafe or unusable by the very people it needs to serve.**

- **No Priority Access to Federal Lands for Inclusive Projects:** The BCH guide discusses leveraging federal land to reduce costs and deliver affordable housing faster[19], which ICC applauds. Yet it does not specify *who* will benefit from those public lands. Without an intentional carve-out, there is a risk that prime federal sites will be allocated solely to large general-purpose developments, with little consideration for inclusive or supportive housing. ICC has consistently advocated that surplus government lands should be made available with priority to non-profit and inclusive housing initiatives[20]. Access to land is often a major barrier for our member agencies; being able to acquire or lease federal land at nominal cost for supportive housing would be transformative. **If Build Canada Homes truly aims to build “strong, resilient communities” and follow the examples of successful housing countries[8], it must ensure that inclusive housing for people with disabilities is woven into developments on public lands.** This means reserving a portion of federal land initiatives for projects that serve people with developmental disabilities or requiring that larger mixed-use projects include some supportive housing component. Currently, no such priority or inclusion mandate is articulated.
- **Lack of Integration of Housing with Support Services:** For people with developmental disabilities, *housing cannot be separated from supports*. Most individuals in this group require some level of ongoing support services (such as caregivers, developmental services workers, or visiting clinicians) to live independently and safely in the community. However, the BCH Market Sounding Guide focuses exclusively on the supply of physical housing units, with no mention of how the necessary support services will be provided or funded. This siloed approach is of great concern. We have seen situations where new affordable housing units for people with disabilities sit vacant or underutilized because the on-site support funding or personnel were not in place. Housing stability for people with IDD depends on coordinated investments in both **“housing and supports”** – the bricks-and-mortar and the social infrastructure. Since support services for persons with disabilities typically fall under provincial jurisdiction, a federal program like BCH must proactively engage those provincial partners to ensure wrap-around supports are available when new units come online. *Without integrating housing with supports, BCH could inadvertently create buildings where people with developmental disabilities still cannot thrive.* In effect, bricks will be laid but the human supports needed for true community living will lag behind. This gap must be addressed through federal-provincial collaboration (as further discussed in our recommendations).

- **Scale and Innovation Must Include Inclusive Housing:** The guide emphasizes building housing “faster, better, smarter” through modern construction methods and large-scale projects (e.g. 300+ unit developments)[21][19]. While we support innovation and efficiency, we note that **much of the supportive housing for developmental disabilities has traditionally been delivered at a smaller scale** – group homes or apartment clusters integrated into the community. There is a concern that BCH’s preference for very large projects and new technologies could unintentionally sideline smaller community-based providers or novel inclusive housing models. Yet, in reality, innovation and scale *can* be achieved in the supportive housing sector. Canadian non-profits are already pioneering models that deliver housing efficiently **while meeting high accessibility and care standards**. For example, ICC member agency Reena has partnered with *Serotiny*, a Canadian firm specializing in prefabricated hybrid timber construction, to create a scalable supportive housing solution. This **model uses a globally-proven hybrid mass timber system** that comes pre-assembled with an integrated building envelope, allowing rapid on-site assembly[22][23]. The result is high-quality housing built significantly faster than conventional methods. *Most importantly*, it achieves **B3 fire safety compliance and 100% universal accessibility**, and operates at 40% below the energy use targets set by CMHC – all while remaining cost-competitive with traditional concrete construction[24]. This is exactly the kind of innovation that BCH could leverage to meet its dual goals of scale and modernization *and* its duty to house those with the greatest needs. However, the guide makes no mention of targeting or incentivizing such inclusive innovations. There is an opportunity – and indeed, a necessity – for BCH to support and scale up **innovative, inclusive construction models** like this, which deliver both efficiency and accessibility. Failing to do so would be a missed opportunity to modernize Canada’s housing ecosystem in an inclusive way.

In summary, ICC is encouraged by the bold scope of Build Canada Homes, but we urge the federal government to address these gaps. **People with developmental disabilities must be explicitly included as a priority population in the design, funding, and implementation of BCH.** Without this focus, Canada’s new housing investments may bypass one of the communities most in need, and the systemic barriers in housing for persons with disabilities will persist. Conversely, by making a few strategic adjustments – as detailed below – BCH can ensure that *no Canadians are left behind* in this historic housing effort.

Recommendations

To remedy the concerns above and align Build Canada Homes with inclusive, supportive housing objectives, ICC makes the following recommendations. These concrete steps will help BCH fulfill its mandate while upholding Canada’s commitments to accessibility, human rights, and the **“progressive realization of the right to adequate housing”** for all citizens[3]:

1. **Establish a Dedicated Supportive Housing Fund for Developmental Disabilities:** Carve out a clear, **dedicated funding stream** within Build Canada Homes (or associated federal housing programs) for projects housing people with developmental disabilities. This could be achieved by earmarking a percentage of BCH’s funding specifically for non-profit supportive housing developments that serve this population. ICC has previously recommended that at least *10% of National Housing Strategy investments* be dedicated to developmental disabilities housing[25], and a similar or greater commitment is warranted under BCH. International research and Canadian experience show that unless funding is explicitly designated, this high-need group can be overlooked[15]. A dedicated envelope will ensure that capital for, say, **500 new supportive housing units per year for people with IDD** is reserved and protected. It should be paired with technical assistance to help developmental

service providers access the funds. By creating this “stream within the stream,” the federal government would send a powerful signal that it recognizes the housing crisis facing Canadians with disabilities and is taking concrete action. *This funding should also be structured flexibly* – allowing it to be used for deep affordability grants, repairs/renovation of existing group homes, and new construction, as needed. **In summary, make people with developmental disabilities a priority for BCH investment, not an afterthought.** This dedicated approach aligns with what sector experts have called for: for example, OASIS (Ontario Agencies Supporting Individuals with Special Needs) recently urged earmarking 10% of upcoming federal-provincial housing funds for developmental services housing[26]. We echo that call at the national level.

2. **Mandate Inclusive Design and Accessibility in All BCH Projects: Every housing project supported by Build Canada Homes should meet high standards of accessibility and universal design.** Accessibility cannot be optional or treated as an “add-on”; it must be baked into the program’s requirements. We recommend that BCH adopt design criteria ensuring a significant portion of units (ideally 100%) in new developments are barrier-free or easily adaptable. At minimum, a universal design approach – where housing is designed from the start to accommodate people of varying abilities and ages – should be the default. This approach is both **morally imperative and cost-effective**. As Canada’s Federal Housing Advocate noted, designing housing to be accessible and adaptable from the outset is cost-neutral – it “doesn’t have to cost more money nor take up a larger footprint” compared to conventional designs[27], and it saves money long-term by avoiding costly retrofits as needs change[27]. Moreover, the tools to do this are already available. For instance, *Accessibility Standards Canada*, in partnership with CMHC, has developed a **Housing Design Catalogue** featuring ready-to-build plans for accessible and adaptable homes[28]. We urge the federal government to require that BCH-funded projects utilize resources like this catalogue and comply with forthcoming federal accessibility standards. Concretely, this could mean scoring applications on their level of accessibility, requiring a certain percentage of units to meet **CSA B651 or local barrier-free codes**, and incentivizing features like fully roll-in showers, wheelchair turning space, visual fire alarms, etc. Additionally, the program’s definition of “affordable housing” should explicitly include *supportive and accessible housing* for persons with disabilities – to ensure these projects qualify and score highly. Finally, we note that the Federal Housing Advocate and National Housing Council are examining ways to integrate accessibility across all federal housing programs[29]. Build Canada Homes can lead by example by making **universal design a non-negotiable core principle**. Doing so will future-proof Canada’s housing stock for an aging population and millions of citizens with disabilities, while fulfilling the spirit of the Accessible Canada Act[29].
3. **Require B3 Fire Code (Care Occupancy) Compliance and Support Its Implementation:** The safety of residents must be paramount in supportive housing. We recommend that BCH **mandate compliance with Care Occupancy (Group B, Division 3)** building code standards for any housing intended to serve people with developmental or other disabilities who require on-site support. In practice, this means features like automatic fire sprinkler systems, fire separations, emergency fire alarms, and emergency lighting must be in place, even in small-scale homes. Currently, many jurisdictions do not require sprinklers in residential projects under a certain size or occupancy, but we know that **sprinklers save lives** – they greatly increase evacuation time and contain fires to their room of origin 97% of the time[17]. BCH should set a uniform safety baseline that exceeds the patchwork of local codes: if public funds are used for supportive housing, that housing should have institutional-level fire and life safety protections. We acknowledge that B3 compliance can modestly increase capital costs (e.g. installing a sprinkler system in a house), so the program should offer dedicated capital grants or top-up funding to

offset these costs for non-profit providers. In addition, federal guidance could be developed to help smaller providers navigate B3 code requirements (which can be complex). By making B3 fire safety a requirement, the federal government will also encourage provinces and municipalities to align their codes and licensing toward safer homes for vulnerable residents. In sum, **BCH should ensure that all housing developed for people with support needs is safe, secure, and meets the highest fire safety standards** – this is both a matter of human rights and public trust. Canada has seen tragedies in the past in housing for people with disabilities that lacked proper safety measures; with BCH, we have an opportunity to definitively raise the bar and save lives.

4. **Prioritize Inclusive Housing Projects in the Use of Federal Lands:** Build Canada Homes should explicitly prioritize that **surplus federal lands** (or federally owned properties) be used for inclusive, accessible housing developments. When federal land is made available for housing, either through transfer, lease, or partnership, projects that serve those in greatest need – such as people with developmental disabilities – should receive **first consideration**. We recommend setting aside a portion of all federal lands slated for housing for proposals by non-profits, co-operatives, or Indigenous organizations that include supportive housing components. For example, if a large federal site is being developed, a certain percentage of the units (or a building on the site) could be designated for supportive housing. Alternatively, separate smaller parcels could be carved out specifically for an ICC member project. The key is a **policy of affirmative allocation**: do not rely solely on open market competitions where niche non-profit projects might be outbid or overlooked by larger players. Instead, carve-out opportunities for inclusive housing. This aligns with ICC’s call for an “*equitable assignment of land, funds, and resources*” for developmental disability housing[20]. It also dovetails with the guide’s mention of partnering with community housing providers and using public land to achieve scale[19] – we simply urge that *supportive housing be explicitly part of that equation*. To implement this, Infrastructure Canada could, for instance, work with CMHC’s Federal Lands Initiative to create a stream for supportive housing, or issue directed Requests for Proposals to the non-profit sector when a suitable property is identified. The benefit of this approach is twofold: it lowers the cost of projects (land being one of the most expensive inputs) and accelerates development timelines by removing land acquisition barriers. ICC and our members are ready to collaborate on identifying potential federal sites (e.g. unused government buildings, lands near health facilities or colleges, etc.) that could be ideal for supportive housing. **Using federal lands for inclusive housing will ensure these public assets are put to their highest and best use – building communities that include everyone.**
5. **Integrate Housing Investments with Support Service Funding (Housing+Supports):** To truly succeed for people with developmental disabilities, BCH must be more than a construction program – it should be a catalyst for “**housing with supports.**” We recommend that the federal government coordinate with provincial and territorial governments to link capital funding for housing with the operational funding for support services. In practical terms, when a project targeting people with developmental disabilities is approved under BCH, there should be a plan in place (and ideally funding commitments) for how residents will receive the necessary supports (e.g. through provincial developmental services budgets, health care, or other programs). This could be facilitated via new federal-provincial agreements or enhancements to the Canada Social Transfer earmarked for supportive housing. We note that in other social programs (e.g. child care, healthcare), the federal government has successfully negotiated agreements to ensure national objectives are met in areas of provincial jurisdiction[30]. A similar collaborative approach is needed here. BCH should explicitly invite proposals that involve partnerships between housing providers and support agencies, and these proposals should be

evaluated favorably. Additionally, the program could include a *support component* – for example, a block of funding or a companion initiative to fund on-site support staff training, the creation of community hubs, or accessible transportation for residents. One model to consider is a **portable rent+support subsidy**: the federal government could fund a portion of rent while provinces fund the support worker hours, allowing individuals to transition from institutional settings or family homes into the new units. By integrating supports, the federal investment in housing will deliver sustained outcomes: residential stability, improved health and wellness, and reduced burden on emergency systems. It will also prevent the costly situation where newly built units intended for people with disabilities remain empty because the necessary support dollars were not lined up. In summary, **“housing” and “supports” are two sides of the same coin for our community – Build Canada Homes should actively bridge that gap.** This will require leadership and coordination, but it is achievable and aligns with the whole-of-government effort needed to end homelessness and fulfill the right to housing.

6. **Ensure Inclusive Eligibility and Evaluation Criteria:** The selection criteria for BCH projects should explicitly include **serving people with disabilities and advancing accessibility** as key considerations. We recommend that the federal government incorporate the following into BCH’s eligibility and evaluation framework: **(a)** a requirement or incentive for proposals to demonstrate how they will house equity-deserving groups (with persons with developmental disabilities named alongside other groups like seniors, Indigenous peoples, etc.), **(b)** points or weighted evaluation for projects that provide deep affordability (rent-geared-to-income or income support-level rents) paired with support services, and **(c)** assessment of a project’s accessibility features and universal design commitments. In other words, a project that plans to house, for example, 20 adults with developmental disabilities in a fully accessible building with on-site supports should rank *very highly* under BCH criteria – higher than a project of equivalent size that has no such inclusion. During the initial market sounding phase, we urge Infrastructure Canada to signal that proposals furthering inclusion will be prioritized. This can be done in the program guidelines and also by setting **target outcomes** (e.g. a target number of units created for people with disabilities or a percentage of BCH-funded units meeting universal design). The importance of this is underscored by past experience: as noted, when broad housing funding was devolved without clear inclusion targets, most jurisdictions did not direct funds to developmental services housing[15]. Clear criteria and targets will correct that. We also propose that *people with disabilities or their representative organizations be included in the governance or advisory structure of Build Canada Homes*. This will bring lived-experience perspective into decision-making on which projects to pursue. Lastly, as part of BCH’s evaluation metrics, the government should track how the program is meeting the needs of those in greatest need – not just the number of units built. This means collecting data and reporting on outcomes such as the reduction in homelessness or housing precarity among persons with disabilities, the number of accessible units created, and tenant well-being improvements. Measuring success by outcomes, not just outputs, will ensure BCH stays focused on those who need housing most[31].
7. **Champion and Scale Up Inclusive Innovation:** Build Canada Homes should become a driver of innovation that benefits *supportive and inclusive housing* specifically. We recommend dedicating a portion of BCH’s innovation and financing tools (loans, equity, loan guarantees, etc.) to projects that demonstrate new solutions for affordable, supportive housing. This could include industrialized construction methods, modular housing campuses, smart home technologies for accessibility, and energy-efficient retrofits of existing group homes. By piloting and scaling such approaches, the new

federal entity can help modernize the supportive housing sector. As highlighted earlier, models like **Serotiny's prefabricated hybrid timber system** show that it's possible to build fast and green without sacrificing inclusivity[24]. The federal government should actively support the replication of these models across provinces. For example, BCH could issue an RFP specifically for proposals that use **mass timber or modular construction** to create supportive housing, or it could partner with organizations like ICC to develop a portfolio of demonstration projects using cutting-edge methods. Prioritizing Canadian-made innovations (as the guide suggests[21]) that also achieve accessibility and support outcomes is a win-win – it grows domestic expertise and meets urgent social needs. We also encourage BCH to facilitate knowledge-sharing in this space: convene workshops or networks where private sector innovators (in design, construction, assistive technology) collaborate with non-profit housing providers to tailor solutions for people with disabilities. In summary, **let BCH be an engine that not only builds more housing, but builds better housing – housing that is sustainable, disaster-resilient, and universally accessible**. This will ensure Canada's push for housing supply also leaves a legacy of inclusion and excellence in design. Federal leadership and investment can de-risk these innovations and accelerate their adoption nationwide.

Governance and Inclusion

As a recognized national not-for-profit voice representing over 60 agencies, the ICC should be at the table at every stage of the Build Canada Homes design and implementation process. This includes participation in advisory committees, governance structures, and regional/local planning forums. Embedding ICC and the disability community from the outset will ensure inclusive perspectives shape policy, eligibility criteria, and project approvals—preventing the exclusion of people with developmental disabilities and accelerating effective solutions.

Conclusion

Canada stands at a pivotal moment in addressing our housing crisis. **Build Canada Homes** is a bold and welcome initiative that has the potential to dramatically increase affordable housing supply and revolutionize how we build. The Intentional Community Consortium firmly believes that this transformation must include *all* Canadians – including those with intellectual and developmental disabilities who have for too long been overlooked in housing policy. By adopting the recommendations above, the federal government can ensure that people with disabilities are no longer an afterthought, but rather a cornerstone of Canada's housing strategy.

In doing so, we will not only address a humanitarian and human rights imperative, but we will also unlock the tremendous social and economic benefits that come from providing stable, supportive homes: reduced strain on healthcare and emergency services, increased participation in communities and the workforce, and the simple dignity of thousands of individuals *finally* having a place to call home. As the Federal Housing Advocate recently wrote, *accessible housing is a moral and pragmatic imperative* for Canada[11] – we couldn't agree more.

ICC and its member organizations are ready to partner with the Government of Canada to make the vision of inclusive, supportive housing a reality. We bring deep expertise, successful pilot models, and a nationwide network committed to this cause. We would welcome the opportunity to discuss these recommendations in detail and to support the design of Build Canada Homes as it moves from concept to implementation.

Thank you for your consideration of our submission. By working together – across federal, provincial, municipal, and community lines – we can ensure that Build Canada Homes truly builds a Canada for all, leaving no one behind. We look forward to the next steps in this important initiative and to continuing our dialogue with you to achieve an inclusive housing future for Canada.

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