

Chatham Kent Municipal Land Bank White Paper

A municipality wide policy for land buildings and public value

Ryan Gow | Standalone campaign policy | Draft 3 | October 1 2026

Executive recommendation

I propose a Chatham-Kent Municipal Land Bank that gives Council a complete view of public land and buildings, prepares suitable assets for use, and makes the reasons for each decision visible. The municipality should know what it owns, what it costs to hold, what constraints affect it and which use will produce the greatest public value before announcing a project or accepting an offer.

The Land Bank would serve housing, employment, infrastructure, energy, community services and long-term municipal needs. It would maintain a municipality-wide inventory, assess competing uses, commission due diligence, coordinate servicing and planning, and manage approved acquisitions, leases and dispositions. Some properties should be developed. Others should remain in public use, be held for a defined future need, leased or sold. Success is the value delivered to residents, not the size of the portfolio.

My recommendation is to begin as a coordinated administrative function under the Chief Administrative Officer, using municipal ownership, existing systems and specialist staff. Council should establish the mandate, budget and decision rules first. A municipal services corporation should be considered later only if an adopted business case establishes a practical advantage after accounting for its costs and risks. A new corporation is not necessary to start an inventory or investigate a site.

Chatham-Kent already has asset-management plans, a surplus-property process, housing review requirements, business-park programs and financial policies. The proposal connects these functions through a common parcel record, one accountable lead and a published sequence of decisions. It does not presume that existing staff have failed or that no internal inventory exists. The first 90 days must establish which records and procedures already work and which handoffs require repair. [1-8]

CK-145 is one prospective customer: the Land Bank could identify and prepare sites for its staged attainable-homeownership proposal, while private builders construct homes and qualified households purchase them. Affordable rental providers, employers, public works, community organizations and energy proponents would use the same land function with different program requirements. No program receives automatic first claim to every property. Existing statutory, bylaw, contractual and funding obligations take priority over this proposed comparison process, including applicable housing-retention and notice requirements.

The proposed Municipal Infrastructure Investment Fund (MIIF) could finance Council-approved enabling infrastructure or site preparation. The Land Bank would manage and prepare the property, with financing separately approved and accounted for. Proposed Maple City Power and other municipal services corporations could seek suitable sites on the same public-value terms as other proponents. Neither financing nor municipal ownership gives a project automatic priority over competing uses.

The first decision

Council should authorize an administrative pilot through the lawful organizational process, require a baseline report within 90 days and a costed portfolio plan within 180 days. Initial work requires an actual appropriation, a named source, permitted planning and diligence scope, a spending ceiling and reporting conditions. This pilot grants no new transaction or capital authority; existing lawful powers remain unchanged. Section 17 provides proposed Council direction.

All new thresholds, scoring weights, staffing levels and budget illustrations in this paper are proposed policy choices or modelling assumptions. They are not statements of existing municipal practice or appropriations. Factual case studies are dated and cited; historical estimates are not current quotations.

1 Mandate and boundaries

The Land Bank is a stewardship and preparation function. It should cover municipally owned land and buildings, underused parts of operational sites, leased interests and assets controlled through municipal entities where appropriate. A separate opportunity register should record strategically available school-board, provincial, federal, institutional and private properties. An opportunity is not a municipal asset, and being listed is not permission to acquire it.

The municipality-wide inventory must include active properties as well as surplus properties. Roads, parks, drainage corridors, utility lands, emergency facilities and environmentally important areas can have high public value even when they generate no rent. Inclusion in the inventory does not imply disposal, development or a change in service. Assets held by local boards or corporations retain their legal owner and decision authority.

Highest and best public use means the most defensible use of an asset after considering legal requirements, service needs, realistic alternatives, lifecycle cost, market demand and public outcomes. It can differ from the use producing the highest immediate selling price. Council must explain that difference and show the financial tradeoff rather than conceal it in a nominal transfer.

The Land Bank should coordinate property decisions but should not become a parallel planning authority, a construction company, a housing service manager or an electricity utility. Planning and building officials retain independent statutory responsibilities. Engineering and the Public Utilities Commission retain their technical and operational roles. Program departments define service needs and operate their approved services. Partners finance, build or operate projects under enforceable agreements.

Relationships with MIIF and municipal corporations

The proposed division of responsibility is explicit. The Land Bank manages, evaluates and prepares strategic municipal land and buildings. MIIF may finance Council-approved enabling infrastructure or site-preparation work within its separately adopted mandate, budget and financing rules. MIIF does not control land, determine its use or authorize a transfer. The Land Bank does not become a capital fund. A project needing both functions requires a public-use decision and a separate funding decision; approval by one does not satisfy the other. No MIIF allocation, legal structure or revenue is assumed by this paper.

Maple City Power (MCP), if separately established and authorized, may be a prospective customer, lessee, development partner or project proponent for an energy site. Other municipal services corporations may seek property for their approved purposes. Each must demonstrate need, capacity and value through the same six gates, independent valuation, conflict controls and Council-reserved decisions. They receive no automatic claim, preferred price or waiver of existing obligations. This proposal does not establish MCP, approve municipal ownership of generation or authorize an energy investment. Any such decision requires its own legal and financial case. Legal Services must assess each entity's actual enabling statute and powers. A possible Land Bank corporation under Municipal Act section 203 and Ontario Regulation 599/06 is distinct from an electricity corporation under Electricity Act section 142; one corporate model must not be applied automatically to MCP or other entities. [16, 17, 47]

Public investment is justified where coordinated land preparation or assembly removes a documented barrier that individual owners cannot reasonably resolve alone, or where the municipality requires land for an approved public purpose. Buying land simply because prices may rise is outside the mandate. An acquisition must solve a defined problem and outperform alternatives, including using an asset already owned.

2 Existing functions and the gaps between them

The public evidence shows a distributed system with real safeguards. The Asset Management Plan addresses infrastructure condition, service and long-term funding. The surplus-property page lists land already declared unnecessary for municipal needs and routes inquiries to Property Disposition. Economic Development markets business parks. Planning manages development review. Housing has its own strategies, funding commitments and projects. These serve different questions; a common land decision must draw on all of them. [1–5, 7, 8]

Function and evidence	Question it answers	Proposed connection
Asset management and facilities [1, 2]	What condition are assets in and what service and renewal costs follow?	Link component records and service plans to each parcel and building; add use alternatives and land constraints.
Property Disposition [3, 4]	What land has been declared surplus and how should it be sold?	Begin public-use review before surplus declaration; preserve the final disposal process.
Housing and Planning review [5, 8]	Which municipal lands could support housing and which approvals apply?	Record housing suitability, commitments and competing needs in one portfolio review.
Economic Development [6]	Which industrial sites and buyers support employment objectives?	Bring demand, servicing capacity and development conditions into the common register.
Planning and development review [7]	Which uses and approvals are legally available?	Separate applicant work from statutory decisions; identify approval and appeal risks before commitments.
Finance and Legal Services [9–13]	What authority, value, funding and obligations govern a transaction?	Require independent checks at each decision gate and a single exposure ledger.

A 2014 Council record described general surplus properties handled through Revenue, with industrial properties sold under Economic Development policies. It also documented departmental consultation and a surplus register. This is historical evidence of separate pathways, not proof that the same reporting lines remain unchanged in 2026. The current organizational and delegation map should be confirmed in the baseline report. [4]

The December 20, 2021 Council minutes directed annual land-disposal review with Housing and Planning before surplus recommendations, retaining land suitable for affordable housing. By-law 228-2021 enacted the related amendment to section 4(a) of disposition By-law 92-2020. The applicable affordable-housing land-retention requirement remains in force unless lawfully amended or waived under its applicable process; a new Land Bank mandate or public-use score does not displace it. The minutes also directed feasibility work for sites including Minnie Street and Westcourt. The Land Bank must implement and reconcile these existing requirements with its broader mandate. [5, 42–44]

The 2025 Facilities Services detailed plan distinguishes the division’s maintenance assets from housing building assets managed by facilities personnel. This shows why a departmental asset registry is not necessarily a complete record of property interests and development readiness. It does not establish that a municipality-wide property inventory is missing. Reconciliation must join the land register, building records, accounting assets and service inventories without duplicating their underlying data. [2]

The current purchasing rules are especially relevant. By-law 19-2026, passed February 23, 2026, repealed 205-2023 and exempts all real estate transactions from solicitation requirements in Schedule A. That schedule also exempts specified professional services, including appraisal and surveying. Staff must classify each study or construction purchase under the applicable rules rather than assume competitive solicitation is universal. A solicitation exemption does not waive transaction authority, valuation, budget approval or conflict controls. [10]

The gap the proposal addresses

The governing gap is the handoff between identifying an asset, deciding its public purpose, costing its constraints and choosing a delivery route. A property can be valuable for housing, needed for infrastructure and capable of generating lease revenue at the same time. Separate project reports can expose these conflicts late. This is an inference from the documented pathways and local cases, not an audit finding of misconduct.

Within 90 days, staff should publish a process map identifying each current register, its custodian, legal owner, update frequency, approval authority and known data gaps. The report should identify where due diligence is repeated, where a project lacks an accountable sponsor and where funding restrictions are not consistently visible. Changes should target those failures rather than create a new approval layer for every routine transaction. The Clerk and Legal Services must also prepare the current authority matrix described in Section 4, using certified instruments and their amendment history rather than a historical organizational chart.

3 Governance options and recommended sequence

Model	Advantages	Limits and decision
Coordinated administrative function	Municipal title remains in place; existing finance, legal, GIS and procurement systems can be used. Direct Council accountability.	Requires a responsible lead, protected staff capacity and deadlines. Recommended first phase.

Model	Advantages	Limits and decision
Dedicated administrative office	Permanent staff and a portfolio budget can manage a sustained workload while ownership stays municipal.	Higher ongoing cost. Establish only after the pilot demonstrates workload and benefit.
Municipal services corporation	A specialized board and transaction structure may support a recurring development or lease portfolio.	Separate governance, accounting, insurance and oversight costs; statutory restrictions and transfer risks. Requires a further business case and public consultation.

The first phase should designate a Land Bank lead accountable to the CAO and a staff portfolio committee including Finance, Legal, Planning, Housing, Economic Development, Facilities, Engineering, GIS and relevant utility representatives. Departments should name delegates with authority to supply records and resolve issues. The committee recommends; it does not replace Council or bind a local board without authority.

Council should approve the mandate, budget, public-use priorities and proposed decision thresholds through lawful instruments. The proposed future schedule would reserve strategic acquisitions, material purpose changes, non-market assistance, major servicing commitments and strategic long leases for Council, while allowing proportionate routine work. Until lawfully adopted, it changes no existing authority. Existing officers may act only within their current powers, limits and approved budgets. The Clerk and Legal Services must distinguish approval, signing and spending authority, and account for mayoral organizational powers and election-transition restrictions. [14, 15, 17, 45, 48, 49]

Every candidate should have a sponsor who needs the property, a transaction manager and a reviewer independent of the sponsor. Finance confirms affordability and total exposure; Legal confirms authority and obligations; technical staff certify their own evidence. A department promoting a project must not certify its own appraisal or accept environmental risk on behalf of the whole municipality.

When a corporation might become justified

A corporation should be tested after at least 12 months of pilot evidence, or earlier only through a separate public business case demonstrating a specific need. Proposed triggers include a sustained portfolio of complex ground leases or assemblies, identifiable financing or contracting advantages, and a workload that existing administrative delegation cannot manage efficiently. Faster decisions alone are insufficient if lawful staff delegation can deliver the same result.

A proposed Land Bank municipal services corporation would require analysis under Municipal Act section 203 and Ontario Regulation 599/06, including the business case, asset-transfer policy and public consultation requirements in sections 6–8 of the regulation. Permitted activities, debt dealings, assistance and provincial or asset restrictions must be assessed for the actual structure. Incorporation creates no general exemption from municipal law. Section 203(3) distinguishes Electricity Act section 142 corporations; MCP's possible electricity structure requires its own assessment, not automatic treatment as a Land Bank MSC. [16, 17, 47]

For a wholly owned corporation, the regulation applies municipal freedom-of-information legislation; directors and officers are subject to its conflict-of-interest provisions. Local-board treatment differs by statute, so ordinary Council meeting rules should not be assumed to apply identically. Legal Services should specify the actual obligations and recommend additional public-meeting and reporting requirements in the shareholder framework. [16]

If Council proceeds, proposed safeguards include municipal ownership of all voting shares, a skills-based board with independent land, finance and environmental expertise, a public appointment process and no active land vendor, bidder or development partner deciding transactions involving that interest. Council should approve a shareholder declaration, annual business plan and consolidated exposure ceiling. Reserve asset transfers, guarantees, borrowing, subsidiaries and changes of mandate for Council approval. Retain core strategic land municipally unless transfer provides a demonstrated benefit.

The business case must compare ten-year costs with the administrative model, including officers, board remuneration, audit, tax advice, insurance, systems, staff duplication and exit costs. Model insolvency and project failure. Separate legal personality may allocate contractual risk, but guarantees, environmental obligations and political expectations can leave the public exposed. No transfer should be presented as removing a liability without a documented legal basis.

Municipal ownership, shareholder approval and a MIIF label do not provide unrestricted financing or assistance authority. For a section 203 structure, counsel must apply Regulation 599/06 section 14 restrictions on specified corporate debt dealings and the conditions of any section 15 assistance exception. Identify the recipient, activities, ownership and ultimate beneficiary before proposing an advance, guarantee or subsidized asset transfer. Apply the separate statutory framework to an electricity corporation or other entity. No corporate borrowing or assistance is authorized by the administrative pilot. [16, 17, 47]

4 Legal authority and limits

The municipality can begin coordinated land stewardship using existing lawful municipal powers, exercised through the required instruments. Municipal Act sections 5(3), 9–11 and 23.1–23.5 support municipal administration and appropriate delegation; section 270(1) requires the relevant sale/disposition and delegation policies. Section 6 addresses acquisition, including expropriation under the Expropriations Act. The Land Bank adds coordination and evidence requirements, not statutory powers or a new decision-maker. [14, 15, 17]

Municipal Act section 106 restricts assistance to industrial and commercial enterprises, including certain below-market property arrangements. Grants under section 107 remain subject to that restriction. A public objective or Council vote alone is not a legal exemption. Counsel must identify any applicable authority, such as lawful community-improvement measures or municipal-capital-facility provisions, for the actual recipient and agreement. [17, 18] Identify the actual recipient and ultimate beneficiary, and the specific statutory authority or exception, before any binding commitment; appraisal and public-benefit disclosure cannot themselves legalize assistance.

Chatham-Kent's Official Plan, zoning and development-review process govern land use. The municipality's November 2025 Community Improvement Plan is another relevant instrument, but a parcel's inclusion in a plan does not automatically authorize every proposed subsidy. Confirm eligible use, applicant, area, costs and agreement terms. The July 2026 growth-planning work should be reflected in current parcel reviews, with approval and appeal status checked before relying on an amendment. [7, 19, 20, 34]

Acquisition, remediation and development can engage environmental, conservation, drainage, heritage, archaeological, agricultural, accessibility and building requirements. Road closures, parkland proceeds, restricted donations and funder agreements require their own treatment. A land policy cannot waive these requirements. Utility or local-board assets must not be treated as freely transferable general municipal property.

Legal Services should produce a transaction-specific authority checklist covering title, municipal purpose, lawful decision-maker, notice, disposal procedure, assistance authority, planning approvals, funder consent, tax consequences and enforceability of remedies. Standard templates can reduce repetitive legal work, while departures involving meaningful risk require fresh review.

Existing disposition and transfer rules remain in force. By-law 92-2020, as amended by 228-2021 and any further lawful amendments, governs applicable surplus declarations, valuation, prior circulation, housing-provider review and notice, public notice, long leases and class exemptions. Its disposition definition includes leases of 21 years or more. The Land Bank must preserve applicable public-body and residential housing-provider notice rights, industrial-land provisions and lawful exemptions. Any proposed departure requires its own authorized amendment or waiver; an inventory listing or gate clearance supplies neither. Legal Services must classify options, renewals and related interests under the actual instruments. [9, 43, 44]

Before any binding commitment, the Clerk and Legal Services must certify a current authority matrix. For each decision it must identify the legal owner, statutory/bylaw basis and amendments, approving body, delegated officer and limits, signing authority, budget authority, notice and consultation prerequisites, and any consent. Cover acquisitions, options, deposits, leases, dispositions, studies, site preparation, transfers, borrowing and guarantees. Published By-law 7-2024 restricts delegation to designated positions and authorized supervisory roles, further delegation and budget compliance; signing permission must not be treated as substantive transaction approval. Its original publication is not a certified current consolidation. Obtain the complete amendment history, including the disposition and delegation instruments. [43–46]

The matrix must distinguish Council policy and appropriation decisions from applicable strong-mayor CAO and organizational powers and their lawful delegation under Municipal Act sections 284.5, 284.6 and 284.13. Check section 275 outgoing-Council restrictions and Ontario Regulation 530/22, including the June 2026 changes made by Regulation 189/26, before authorization, organizational changes or commitments during the 2026 transition. Applicability depends on the statutory circumstances; this paper does not assert that Chatham-Kent is presently restricted. Recheck authority when those circumstances change. [17, 48, 49]

Acquisition powers

The preferred tools are negotiated purchases, conditional agreements, paid options, exchanges, leases and rights of first refusal where justified. Conditions should provide access for testing, adequate time, clear termination rights and a maximum price. A seller's urgency is not a reason to waive investigation. Donations require the same liability review as purchases; a free contaminated asset can impose a large public cost. Any conditional acquisition, option, deposit or other binding commitment requires existing delegated authority or separate Council approval, together with approved funding. Conditions and refundable deposits do not remove this requirement.

Expropriation should be a last resort for a defined municipal purpose when reasonable negotiation and alternatives fail. It requires the statutory approval, notice and compensation process, not a Land Bank officer's decision. Compensation, professional fees, relocation impacts and litigation exposure belong in the acquisition case. The policy should not use tax-sale enforcement as a substitute for negotiated land assembly. [17, 21]

5 Parcel and building inventory standards

Create one authoritative property register built around legal parcels and linked building identifiers. Use the existing GIS and asset systems wherever practical. One building can occupy several parcels and one parcel can contain several assets. Each relationship must remain visible. The register should distinguish owned, leased, controlled by agreement, partner-owned and merely prospective interests.

Record group	Minimum fields
Identity and control	Unique ID, PIN and roll references, legal description, address, community and ward, surveyed and mapped areas, legal owner, custodian, tenure and control evidence.
Use and commitments	Actual use, service purpose, users and tenants, utilization evidence, leases, easements, licences, restrictions, purchase rationale, Council resolutions and funder conditions.
Planning and constraints	Official Plan and zoning, approvals and appeals, access, flood and erosion constraints, drains, heritage and archaeological screening, environmental and geotechnical status.
Servicing and capacity	Water, wastewater, stormwater, electrical and other utility capacity, dated confirmations, off-site works, cost estimates, beneficiary allocation and connection lead times.
Buildings and land	Building area, condition, accessibility, hazardous materials, energy performance, capital needs, occupancy and alternative-use feasibility; gross and net usable land.
Value and financial exposure	Book value, assessed value, independent market value and date, acquisition basis, studies, carrying costs, obligations, remediation ranges, restrictions and committed capital.
Delivery and accountability	Proposed uses, sponsor, gate status, unresolved issues, funding status, milestones, agreements, outcome indicators, last review date, source links and confidence level.

Book value, tax assessment and market value are different measures. None should be substituted for another without explanation. A register can be complete in coverage while some entries remain uncertain. Use verified, provisional and unresolved evidence flags. Never convert an unknown servicing cost into zero. GIS boundaries require legal verification before a conveyance.

Reconcile the register with land-title records, assessment rolls, fixed-asset accounts, insurance schedules, departmental lists, leases and corporate/local-board records. Each department should certify its submissions and report omissions. Record discrepancies and the action needed to resolve them. Annual reconciliation and event-driven updates after acquisitions, leases, demolition or changes in use should prevent another static list.

The public version should show ownership category, current purpose, approximate area, readiness status, constraints in plain language and Council decisions. Keep negotiation limits, personal information, protected infrastructure details and privileged advice in a controlled record. Clearly label private opportunities as unowned and exclude confidential seller information. Publish downloadable data and a map with a last-updated date, accessible without proprietary expertise.

Identifying underuse

Use measured evidence: occupied floor area, hours used, service volumes, lease revenue, operating cost and condition. Compare alternative service delivery and the cost of relocating users. A small rural facility may be essential despite low throughput, and a partly vacant site may provide needed emergency capacity or expansion space. Proposed utilization triggers start a review; they do not authorize closure. Low utilization alone cannot make a rural facility surplus. Record the population and area served, travel time, accessible transport, seasonal or emergency roles and the availability of alternatives. Review shared regional service centres and library/service-hub models before proposing a loss of local access.

6 Highest and best public use

First exclude uses that cannot satisfy legal, environmental or safety requirements. Then compare retaining the current use, renovating or sharing the asset, holding for a defined need, ground leasing, developing, disposing and obtaining another site. Include mixed uses and parcel subdivision where practical. For each alternative, identify beneficiaries, delivery partner, full cost, schedule and risks.

The conventional market highest-and-best-use appraisal tests the property's realistic development potential. The public-use review adds service, community and strategic considerations. Obtain the market assessment independently before choosing a subsidized public outcome. Council should see both the market opportunity and the reason for accepting a different return.

Proposed criterion	Weight	Evidence required
Public need and service outcome	25%	Approved service need, housing evidence, employment demand or community benefit with measurable users. Geographic service coverage and accessible alternatives for facilities.
Lifecycle financial value	25%	Net costs and receipts over a stated horizon, residual value, tax/rate impacts and opportunity cost.
Deliverability and constraints	20%	Control, engineering, approvals, environmental work, sponsor capacity and feasible schedule.
Strategic land and infrastructure fit	15%	Growth plans, employment supply, utility corridors, climate adaptation and future service requirements.
Community and environmental effects	15%	Access, rural service effects, displacement, agriculture, natural systems and consultation findings.

These are proposed starting weights. Each criterion should be scored from zero to five with reasons and evidence confidence. Show alternative weights where the outcome is close. A legal prohibition, unmanageable liability or unfunded commitment overrides the score. Council may choose another lawful option, but must publish the reason, incremental cost and consequences. It cannot vote away a statutory restriction. Use published scoring anchors for zero through five, identify overlapping criteria and count the same benefit only once. Confidence flags and sensitivity tests must make uncertain evidence visible rather than create false precision.

Housing and economic development should be assessed together without pretending their benefits are identical. An industrial parcel with scarce power capacity, highway access and separation from residential uses may be difficult to replace. A centrally located serviced property may be more valuable for housing or community services. Job forecasts require credibility checks; housing claims require realistic yield, affordability and occupancy. Do not award either use an automatic preference across the entire portfolio. This comparison remains subject to applicable affordable-housing retention rules and other binding purpose restrictions; competing scores cannot override them.

Geographic service equity must be part of every major facilities comparison. Measure how each option changes access across Chatham-Kent, including residents without a car, people with disabilities and communities with limited transit or digital access. Test shared regional service centres, library/service hubs, scheduled outreach and co-location of compatible services. Concentrating back-office work may be efficient while retaining local public-facing access. Consultation and a funded service plan must precede a proposed closure; an aggregate utilization score cannot decide it.

Land and buildings acquired or funded for a defined public purpose should retain a presumption in favour of that purpose. Council should redirect them only after publicly demonstrating why another use produces greater public value, comparing feasible alternatives and addressing lost capacity, replacement arrangements and funding consequences. The housing-purpose presumption remains stronger where housing-funded land is concerned: Council must also demonstrate necessity before changing course. The same general discipline applies to employment, recreation, infrastructure, energy and other purpose-specific acquisitions. Legal and Finance staff must identify consents, repayment, replacement expenditure and restrictions; a public-value finding cannot override contractual or statutory conditions. Unresolved funder restrictions or required consents are a hard stop before commitment. Confirm the applicable agreement and obtain necessary consent, or establish that none is required, before accepting a binding obligation. The proposed presumption supplements existing law, including By-laws 92-2020 and 228-2021; it does not dilute their applicable affordable-housing retention requirement. [43, 44]

Retention also requires a case. Define the future need, review date, interim use and maximum holding exposure. A corridor reservation can be sensible without a near-term project, but vague optimism is not a retention strategy. Use 20-year lifecycle comparisons as a starting point for major facilities and long leases, with shorter holding-period analysis for development assets. Where obligations extend beyond 20 years, require full-term analysis or explicit terminal-value and restoration treatment covering remaining receipts, costs, renewal exposure, residual condition and funded end-of-term obligations. Finance must disclose discount and escalation assumptions and sensitivities.

7 Site readiness and project announcements

Use a common sequence with proportionate evidence. A routine remnant sale should not require the studies needed for a residential conversion or industrial assembly. Nevertheless, no property should be advertised as ready for a use beyond what its evidence supports. Early public engagement can discuss possible uses while stating unresolved questions. The six gates are evidence requirements alongside existing statutory and municipal decision-making powers. They confer no transaction, spending or planning authority. A proposed Council reservation operates only through a lawfully adopted instrument; existing authorities continue meanwhile.

Gate	Required decision evidence	Authority and result
1 Register and screen	Control category, current obligations, service need, preliminary constraints and alternative uses.	Lead and program sponsor identify candidates or retain current use. No development promise.

Gate	Required decision evidence	Authority and result
2 Investigate	Title and survey review, independent value, environmental and ground work, building studies and preliminary engineering.	Finance and Legal review a capped diligence plan. Any conditional acquisition, option, deposit or other binding commitment requires existing delegated authority or separate Council approval, together with approved funding. Gate clearance is evidence, not authority.
3 Select public use	Comparable alternatives, consultation, net usable area, costed servicing, lifecycle case and identified sponsor. Purpose restrictions and geographic service access; major buildings require a consolidation and reuse comparison.	The lawful decision-maker selects the use; Council decides material or contested cases where required by existing or lawfully adopted rules. No committee authority is created.
4 Confirm delivery readiness	Required approvals and appeal status, detailed scope and cost range, capacity confirmations, funding, procurement route and enforceable agreements. Separate MIIF funding authority and reconciled cost allocations where applicable. Resolve funder restrictions and obtain required consents before commitment; apply the adopted parcel/project accounting protocol.	Technical reviewers, Treasurer and Legal certify evidence. Obtain all existing approvals and budget authority; certification alone cannot authorize a commitment.
5 Release and deliver	Closing or lease conditions, securities, milestone dates, inspection duties and remedies; construction-ready requirements where relevant.	Officers with current signing authority execute only after the required substantive approvals, funding and conditions are satisfied; report progress and exceptions.
6 Verify results	Actual use, occupancy or service delivery, capital and operating costs, obligations and public benefit.	Sponsor and Finance report outcomes, recovery, closure or revised retention plan.

A parcel is not shovel-ready until servicing and major constraints have been costed and the remaining approvals, funding and delivery steps are explicit. For a construction-ready release, confirm the approvals and physical works required to begin the stated scope, not merely zoning or ownership. Record the date, intended use, responsible engineer and any conditions. Readiness expires when material facts change.

Environmental diligence should begin with a qualified review of prior uses and a Phase One assessment appropriate to the transaction. Follow with Phase Two investigation where warranted. Ontario's Record of Site Condition framework has specific requirements for assessments and some changes of use; the applicable requirements must be determined for each site. A clean screening result is not a guarantee of no contamination. [22]

Site preparation must also consider excess soil, demolition materials, foundations, groundwater, flood and erosion, archaeological potential, species and natural features, drainage works and off-site infrastructure. Require written utility capacity and timing evidence. An existing pipe or nearby electrical line is not proof of available capacity. Cost network improvements and allocate them transparently between the project, existing users and future growth.

No gate permits spending beyond its appropriation. An estimate should show its confidence, exclusions, escalation allowance, contingency and risk owner. A material change in use, yield, constraints or funding returns the project to the relevant gate. The communications record should distinguish a candidate, a use selected for investigation, a conditional agreement and an approved delivery project.

8 Local case studies

55 Minnie Street and the cost of servicing

The municipal August 2024 Westcourt staff report records pre-design and costing of 43- and 58-unit options at 55 Minnie Street, Wallaceburg, and notice of a \$4,074,560 funding approval on March 6, 2024. Further servicing review identified surrounding water, wastewater and stormwater improvements estimated at up to \$7 million. The report describes seeking to redirect the funding toward the more advanced Westcourt project because of infrastructure resources, costs and deadlines. These are historical housing concepts and estimates, not present-day quotations. [23] The current engineering position, actual funding disposition and any later approvals remain to be confirmed before a new commitment.

Minnie demonstrates that available land, a concept and funding approval do not settle project economics. The appropriate Land Bank response is a dated engineering case comparing uses, network beneficiaries, sequencing and alternative sites. It should record what has already been studied and avoid paying to repeat usable work. It should also identify whether an infrastructure investment has broader value even if the original project cannot bear its full cost.

The proposed governing rule is to cost major servicing requirements before announcing a parcel as shovel-ready. If a later assessment changes the economics, disclose the change and revise or stop the project. The Land Bank should preserve the option of a future viable use without carrying an unsupported promise of immediate construction.

426 Lacroix and competing public purposes

The municipality's November 2025 acquisition announcement identified more than 4.4 acres at the former St. Ursula School, 426 Lacroix Street, for affordable and attainable housing. The announced \$1,699,999 purchase was to be funded entirely through the Affordable Housing Reserve using CMHC Housing Accelerator Fund dollars. The Fire Station 1 design tender subsequently specified this location and was recorded as awarded September 15, 2026. [24, 25] This announcement does not establish registered title, closing, disbursement or the ultimate ledger allocation; those transaction records remain unresolved.

The precise split matters. September 23, 2026 Local Journalism Initiative reporting attributes an approximately 1.1-acre firehall footprint to the municipality's infrastructure head, with the balance intended for housing. That acreage is reported context, not a certified subdivision or housing yield. The primary tender verifies the design location, not that footprint or final construction readiness. [25, 26]

A Land Bank record should carry the acquisition purpose and source of funds forward into every proposed use change. Council should compare fire-service need and alternative sites with housing yield, shared access, setbacks, stormwater, servicing and replacement housing land. Gross remaining acreage cannot establish the number of homes that can be delivered.

The proposed housing presumption would require a public explanation of necessity and greater public value before housing-funded land is redirected, subject to the existing lawful retention rules. Legal and Finance staff must examine the executed CMHC agreement, actual expenditure records, eligibility, reporting and required consent or repayment. Unresolved restrictions or consents stop commitment to a changed use. The announcement and design records do not prove that the firehall is unlawful or federal conditions were breached. This is accountable protection of purpose, not an unsupported allegation. [24, 25, 43, 44]

Municipal facilities and the Community Hub transition

The official Community Hub project page describes consolidation of the Civic Centre, Chatham library and museum into the facility at 130 King Street West. Its published FAQs describe reviewing municipal reuse first, then other public agencies and market sale for buildings no longer needed. These are documented processes and transition opportunities; they do not establish that every affected facility is presently vacant, underused or available. [27, 28]

Before disposing of a major municipal building, the Land Bank should test continued municipal use, co-location of compatible services, adaptive reuse, consolidation of scattered offices, elimination of avoidable leases and disposition of properties made genuinely redundant by consolidation. Assess each building and associated land separately. Compare community lease, redevelopment and disposal against condition, accessibility and conversion costs. Include moving users, maintaining security during vacancy, demolition, heritage questions and any effect on the Hub's approved financial plan. Do not promise housing conversion without an engineering and operating case.

The objective is consolidation without unnecessary centralization of services away from rural communities. A larger Chatham office does not, by itself, justify closing a rural service point. A property becomes genuinely redundant only when its required functions have a funded, workable home and service access is maintained or a change is explicitly approved. Broader underused-facility work should begin with utilization evidence supplied by Facilities and service departments. Rural access, emergency use, volunteer commitments and replacement service costs remain part of the review. A closure recommendation requires its own service decision and public process.

The existing Civic Centre provides a supported transition example. Council's April 2026 agenda identifies the Council Chambers at 315 King Street West. The January 2024 Hub staff report described 43,500 square feet of administration, atrium and Council space, with a further 11,500 square feet for Fire Station 1 and 5,900 square feet of basement storage below the regulated flood elevation. These are dated space descriptions, not a current measurement of reusable floor area. The municipal FAQs identify accessibility deficiencies and direct consideration of municipal reuse before disposal. [28, 35, 40]

A Civic Centre assessment should therefore separate the administrative, fire-service and basement areas, confirm title and current obligations, and price continued use, office consolidation and adaptive reuse. The proposed Fire Station 1 relocation must be checked against actual approvals and delivery dates; its design tender does not establish that existing space is available. Savings must include conversion and operating costs, displaced uses and any change to expected Hub sale proceeds. This paper directs comparison, not sale or retention. [25] The case file must identify current Hub contracts, approved financing assumptions and any asset-disposal commitment before comparing alternatives.

435 Grand Avenue West is an evidence-supported example of an occupied, constrained campus, rather than a certified disposal candidate. The April 2024 cabin-location report identifies municipal ownership and the Health and Human Services office, and describes a provincial courthouse lease ending April 1, 2031 that covers much of the surrounding green space and parking. Current municipal service pages locate Employment and Social Services and Housing Services there; CK Public Health lists Grand Avenue offices alongside separate clinic locations. These records support examining compatible co-location and service relationships, not assuming spare space or a lease saving. [36–38, 41]

For Grand Avenue, Facilities must first establish verified gross and usable floor areas, occupancy by service and tenant, building condition, lease boundaries, parking obligations, conversion costs and current provincial consent requirements. No building-size or spare-capacity claim is made here. A shared street address is not proof that every building or open area can be reassigned. Any consolidation proposal must preserve client privacy, appropriate separation and accessible service delivery, and compare retaining the campus with other locations. The executed courthouse lease and all amendments, current title and any actual consent requirement remain unresolved transaction questions; the historical report cannot certify them.

Park Avenue Business Centre illustrates why ownership and shared systems also matter. An April 27, 2026 renovation report states that the municipality owns and occupies a portion of a former industrial building, with the remainder associated with a condominium corporation and shared fire protection. It identifies aging core systems and recommends construction and consulting awards. This is evidence of a facilities investment and ownership constraint, not proof of surplus capacity or a completed renovation. Obtain the municipal-unit areas, condominium documents, current contracts and service plan before any portfolio recommendation. [39] Municipal-unit title, the condominium declaration, shared-cost obligations and current award or construction commitments must be verified; none is presumed available for reassignment.

Industrial land and development conditions

Economic Development's Bloomfield Business Park page describes industrial land with municipal and utility servicing and publishes development conditions: construction must begin within one year, resale before agreed development is restricted and the municipality has a right to reacquire undeveloped land at the original sale price. The same site expressly identifies Park Avenue East and Sass Road as private development. The register must distinguish municipal assets from privately marketed opportunities. Current lot availability and parcel-specific capacity require confirmation. [6, 29] Published conditions do not replace review of the actual agreement, title and practical enforcement capacity.

Bloomfield offers a useful starting point for anti-speculation clauses. The Land Bank should record obligations, monitor deadlines and act when they are missed. Comparable industrial proposals should be judged on executable investment, credible employment, utility load, servicing cost and development timing. A discounted sale with a vague job promise should not outrank an enforceable, financeable project.

Industrial land should not be sold or rezoned simply because it has remained vacant. Assess the supply of substitutable sites, network capacity and realistic employer demand. Equally, indefinite retention for an employer that never arrives imposes costs. Establish periodic market review and a reasoned retain, reconfigure, lease or dispose decision.

Ridgetown and Bothwell solar lease opportunities

The October 6, 2025 Council minutes authorized lease agreements with FLT Energy for approximately 22 acres of municipally owned industrially zoned, farmed land off Mitton Line in Ridgetown and approximately 10 acres of vacant municipal land off Elm Street West in Bothwell. The approved terms contemplated November 2026 to April 2050, with \$500 per acre before commercial operation and \$3,400 per acre after it, subject to final terms approval. This establishes Council-authorized terms, not proof of executed leases, a power contract, construction or operating revenue. [30] The final executed terms, rent payment frequency, commencement conditions and current lease rights remain to be verified.

Neither the Ridgetown nor the Bothwell project appears in the IESO May 8, 2026 LT2 energy-window selected-project table. This later procurement evidence does not prove lease termination, cancellation or inability to pursue another procurement. Obtain current confirmation from the municipality and proponent before forecasting rent, releasing land or assuming a power contract. [50]

The cases show how energy and land stewardship intersect. A long lease can generate income while preserving ownership, but it may exclude industrial or other uses for decades. The Land Bank should compare lease value with future employment demand, existing farm income, access, grid capacity and alternative energy sites. Confirm actual lease execution and current project status before making any budget assumption. The comparison must include energy, industrial development, housing where lawful and feasible, municipal infrastructure, community use and retention. If MCP later proposes a project, municipal ownership of the proponent gives it no automatic claim to the Ridgetown or Bothwell land, or to replacement sites. Existing third-party leases and rights must be respected. Any proposal to change an industrial reservation or an approved lease must identify the public-value gain, displaced purpose and financial consequences through Council.

Energy agreements should address option duration, rent during development, commercial-operation deadlines, indexation where agreed, assignment and lender step-in, insurance, environmental liability, taxes, decommissioning security and restoration. Distinguish approval as landlord from municipal support in an energy procurement and from provincial or grid approvals. Municipal support alone does not establish project viability.

A proposed screening program could examine municipal rooftops, parking areas and already disturbed lands for solar or other suitable energy uses. These are asset classes for investigation, not certified renewable-energy sites. Structural capacity, roof replacement timing, land constraints, interconnection, tariff or power-purchase terms and net lifecycle value must determine viability. No future municipal energy company is assumed necessary or profitable.

9 Acquisition and holding discipline

Every acquisition case should state the public problem, alternatives, required area, independent value, maximum all-in commitment and the reason to act now. Include purchase price, closing and tax costs, studies, remediation, demolition, servicing, relocation, financing, holding and exit. Record the cost of doing nothing. An asking price is not a valuation and an assessment reduction is not proof of a bargain.

Prefer conditional control before ownership when uncertainty can be resolved within an option period. Cap option fees and extensions. Do not acquire a property with an unbounded environmental exposure merely because a grant deadline is approaching. A risk-transfer agreement is valuable only to the extent the counterparty can perform it; assess indemnity enforceability, insurance exclusions and seller financial strength.

Strategic acquisitions should be tied to an approved service or land-supply plan and an identified funding source. Assembly must include the risk that a missing parcel makes the purchase unusable. Assess staged closings, access rights and fallback use. Do not expose the municipality to an open-ended auction or waive conditions to win a competitive sale. Review approval, signing and funding authority before conditional control as well as closing, and verify that existing restrictions permit the intended commitment.

Adopt an annual holding plan for each idle asset: permitted interim use, safety and maintenance duties, annual cost, expected next decision and exit trigger. Farm, parking or community licences can help where compatible with future use, but must not quietly create long-term commitments or displace approved users. Staff should review inactive development assets at least annually and return stalled cases to Council with retain, repurpose or exit options.

A proposed trigger is a formal review after 24 months without the next approved milestone, or sooner when cost, demand or funding changes materially. It is a review trigger rather than an automatic sale deadline. Corridors and other justified long-term reserves may have different horizons. All extensions should state the additional exposure and a new decision date.

10 Valuation disposition and protection of public value

The existing Asset Transfer Policy, revised December 2012, requires a current fair-market-value determination before transfers to municipally owned corporations, advance Council approval and a Treasurer statement for grants or below-market assistance. It allows staff valuation where they consider it reliable and permits conditions on use, retransfer and further disposition. The proposed Land Bank policy should extend consistent valuation and disclosure across its transactions and tighten independence for material cases. [9]

The proposed appraisal thresholds are additional safeguards and do not reduce any valuation or appraisal requirement under existing municipal bylaws or policies. As an added standard, require an independent qualified appraisal above \$250,000, for all strategic long leases and every subsidized, related-party or materially contested-use transfer. Smaller remnant transactions may use comparable evidence only where existing rules permit and no added trigger requires appraisal. Thresholds require lawful adoption; no exemption or waiver is presumed. Aggregate connected transactions rather than divide commitments to avoid review. [9, 43, 44]

By-law 92-2020 requires independent written fair-market-value appraisal for its ordinary disposition process, subject to its actual exceptions and lawful waivers. Its assessed-value exceptions are not the proposed \$250,000 market-value threshold. Legal and Finance must document the applicable valuation route and any authorized exception in each file. Industrial pricing and other exempt classes require their own bylaw analysis. [43]

For this proposed policy, “material” includes a transaction above the added appraisal threshold, any subsidy or related-party issue, a purpose change, significant service or environmental exposure, or a commitment outside an approved budget or delegation. A “strategic long lease” includes a term of 21 years or more and any shorter arrangement materially restricting future public use or scarce capacity. Aggregate economically connected parcels, options, deposits, renewals and phases for proposed review thresholds, without replacing any statutory or bylaw valuation method. Existing rules may require review below these proposed thresholds.

Appraise the actual interest and conditions being conveyed. Show unrestricted market value, value subject to proposed restrictions and any quantifiable assistance separately. Use a second independent review where value is disputed or an exceptional transaction is proposed. Refresh an appraisal older than 12 months, and sooner after a material market, zoning, servicing or condition change. A negotiated price above appraised value requires explicit justification and Council approval.

Choose disposal route after public-use review and compliance with the municipality's applicable surplus and notice rules. Open market sale is the default proposed route for ordinary commercial assets. A competitive public-benefit proposal can select a partner where use, affordability or service outcomes matter, using published criteria and a clear subsidy ceiling. Direct negotiation is appropriate only with a documented reason, such as an otherwise unusable remnant or necessary assembly, and approval under the applicable delegation. The proposed route does not supplant existing disposition procedures, notice rights, housing-provider review, long-lease treatment or exemptions. Apply them unless lawfully amended or waived through their applicable process. [43, 44]

A below-market transfer must disclose market value, consideration, land discount, fee relief, grants, municipal servicing and guarantees. Explain who ultimately benefits and how delivery will be enforced. Counsel must certify the legal authority before approval. Do not treat incorporation, nonprofit status or an economic-development label as a universal exemption from assistance restrictions.

Use contractual and registered protections suited to the interest transferred: development deadlines, performance security, permitted use, restrictions on assignment, recovery of subsidies, options to repurchase or remedies for non-performance. Counsel must test enforceability, title and lender priority. A reacquisition clause without funds or practical enforcement capacity is not sufficient protection. Extensions require evidence and should not reward speculative holding. Test priority against secured lenders, insolvency, available remedies, realistic net recovery, legal expense and the cash needed to repurchase or restore the site before accepting the protection as effective.

Ground leases

Ground leases can preserve ownership and support long-term public purpose. Compare their net present value, renewal obligations and residual condition with sale or retention. Specify rent review, escalation, capital improvements, repairs, taxes, insurance, contamination, accessibility, permitted use, assignment, financing, default, termination and end-of-term restoration. Discounted rent is assistance and should be valued and justified like a land discount. For obligations beyond 20 years, apply the full-term or explicit terminal-value/restoration requirement in Section 6, including renewal and lender-enforcement effects.

Long lease terms may support financing but can constrain future public choices. Model that opportunity cost. Housing leases require affordability and occupancy obligations as well as lender-compatible security; community leases require evidence that the operator can maintain the building. Energy leases need funded decommissioning. Do not use one standard term or lease length for every use.

11 Financial controls and funding

The Land Bank should operate with a distinct cost centre and parcel-level ledger within municipal accounts. Council should appropriate operating, due-diligence, acquisition and servicing budgets separately. The Treasurer should maintain one consolidated exposure report covering the municipality and any Land Bank entity. A transfer between public entities does not create new public wealth. Before commitments involving the Land Bank or MIIF, require an adopted Treasurer-prepared parcel/project accounting protocol, with Council approval of any associated funding policy or appropriation. A consolidated risk/exposure report is distinct from statutory financial-statement consolidation; use the proper accounting classification for each entity.

Under the adopted protocol, identify the appropriation and cash source, expense versus capitalization, asset ownership, recoverable-advance basis, internal transfers, transactions with external or separate legal entities, debt, guarantees, contingent liabilities and recoveries. Apply municipal accounting policies to the actual expenditure rather than treat every preparation cost as operating or capital. Include applicable tax/HST and transaction costs. Land appreciation is not cash; restricted sale proceeds and repayment obligations must be resolved before recycling funds. A revolving reserve cannot recycle a permanent subsidy.

For work involving MIIF, use a common parcel and project identifier and a Treasurer-approved allocation of responsibilities. The infrastructure invoice is one expenditure; a MIIF advance or internal budget transfer is its financing, not a second project cost. Reconcile source, recipient, payable or receivable, capital ownership, debt service and repayment obligations in the consolidated exposure report. Eliminate internal transfers when presenting total municipal cost, while retaining entity-level accountability. Distinguish internal financing from enforceable transactions with separate entities; report gross entity exposure and net external municipal exposure with transparent adjustments. Any advance, debt instrument or guarantee also requires its own lawful authority and approved funding, including applicable corporate restrictions.

A recovery from a developer, land sale or lease must be recorded once and distributed under a written allocation approved before commitment, respecting funder restrictions and any MIIF repayment rights. The Land Bank must not claim the same receipt as portfolio income while MIIF reports it as additional municipal revenue. Repayment of principal replenishes financing capacity; it is not new profit. Disclose outstanding advances, unrecovered preparation costs and permanent subsidies, and reconcile the two ledgers at least quarterly. Project benefits and claimed savings must also be attributed once. The protocol must specify capitalization, interest, loss/provision treatment, unrecoverable advances, guarantee and contingent-liability disclosure, restrictions and authorized allocation of each recovery. Finance must reconcile the risk report to the relevant ledgers and explain consolidation adjustments without counting external obligations away.

Chatham-Kent already publishes reserve, debt-management and asset-retirement policies. Its 2023 Debt Management Strategy distinguishes lifecycle maintenance, growth and new initiatives, and emphasizes matching funding with benefits. The Land Bank should operate within this framework and show the opportunity cost of diverting funds from existing asset needs. Historical reserve or debt balances must not be presented as current available financing. [11–13]

Illustrative first year program envelope

Cost category	Lower estimate	Upper estimate
Dedicated staff capacity including benefits	\$250,000	\$350,000

Cost category	Lower estimate	Upper estimate
Allocated shared legal finance and technical capacity	\$50,000	\$100,000
Appraisal environmental engineering and building studies	\$200,000	\$350,000
Data reconciliation systems and public reporting	\$25,000	\$40,000
Incremental security insurance and interim holding costs	\$50,000	\$100,000
Contingency for the approved pilot scope	\$75,000	\$110,000
Total illustrative annual envelope	\$650,000	\$1,050,000

These are gross planning allowances, not salary surveys, consultant quotations, an approved staffing establishment or an automatic \$650,000–\$1.05-million addition to the municipal budget. They exclude acquisition, major remediation, construction and significant servicing. Shared capacity must not be charged twice, and carrying costs must distinguish new obligations from costs already in departmental budgets. Staff should replace the illustration with a bottom-up plan before permanent staffing is approved. The illustration is a program planning envelope, not a ruling on accounting expense classification. The bottom-up replacement must identify staff hours, study scopes and quotations, workload, transition/backfill and the cost of independent control review and enforcement capacity within the appropriate categories. Contingency is not a substitute for known costs.

The staffing and funding case must identify existing capacity that can be reassigned, the services affected by reassignment, duplicated work that can be eliminated, outside consulting that can be avoided, lease and carrying costs that can be saved, and other credible offsets. Report gross program cost, existing expenditure or capacity reassigned, transition and backfill costs, verified reductions in other budgets, and net incremental municipal cost. Redeployed staff time has an opportunity cost even when it requires no new appropriation. No permanent position should be recommended before this comparison is presented.

Finance should reconcile the cost bridge against the municipal budget. The incremental funding request is new program spending plus transition and backfill costs, less verified cash expenditure reductions elsewhere. Separately disclose the full cost of existing staff and systems assigned to the function. Count a lease saving only when termination, replacement accommodation and service costs are included and the saving can be realized. Staff hours released are a capacity benefit, not cash savings unless a corresponding expenditure is actually avoided. Forecast offsets remain separate from realized results; land sale proceeds are not recurring operating savings.

The proposed initial ceiling is \$150,000 of incremental planning and diligence expenditure for the first 90 days. The adopting instrument must name an actual appropriation source and budget account, the permitted scope and spending ceiling, and reporting conditions. Treasurer certification confirms source availability and legality; it cannot substitute for appropriation. If no source is identified and lawfully approved, no allocation is authorized. Permitted work is inventory reconciliation, authority mapping, policy and accounting design, baseline analysis and specifically approved professional diligence. It excludes acquisitions, options, transaction deposits, leases, physical site preparation, remediation or construction, borrowing, guarantees, incorporation, permanent new positions and commitments beyond the approved pilot unless separately authorized. No reserve or grant is assumed available.

The CAO and Treasurer must return within 30 days with the funded work plan and phased gross-to-incremental cost bridge, and report expenditure, commitments, source balance and scope exceptions at least monthly during the initial period and in the 90-day report. Count the initial allocation within, not on top of, any later first-year appropriation; disclose reassigned capacity and backfill separately. Council must approve any remaining annual scope and funding through the lawful budget process after the baseline. The protocol and portfolio liquidity test must accompany a request for further appropriation.

For each material project, require monthly cash flow, peak outstanding exposure, committed funding, cost-to-complete, contingency, debt service and the fallback if revenue is delayed. The Treasurer should set portfolio and parcel ceilings before commitment. Include leases, guarantees, options, purchase obligations and reinstatement duties. Proposed limits should be actual amounts approved by Council, not vague discretion to spend within a future sale value. At portfolio level, test simultaneous failures, peak external cash need, reserve floors and competing approved capital obligations; expected sales, recoveries or future grants are not available liquidity. Include enforcement, repurchase and closure funding in the exposure ceiling.

Require a return to Council when forecast total cost exceeds its approved ceiling, the public purpose changes, a material funding source disappears or risk exceeds the approved allowance. A proposed early-warning threshold is a forecast variance above 10% or \$100,000, whichever is lower, with all unbudgeted commitments requiring approval regardless of that trigger. Emergency safety spending follows existing lawful authority and subsequent reporting.

Federal provincial and other support

Pursue external support for eligible project costs, not as an assumed general capitalization of the Land Bank. Grants, repayable loans, infrastructure investment, discounted land and partner equity are different resources. Each has an applicant, eligible scope, timing, repayment or use conditions and stacking rules. Buyer assistance belongs to a housing program and should not be counted as Land Bank income.

Housing Accelerator Fund money is already part of Chatham-Kent's housing resources, as illustrated by Lacroix. The Land Bank must track approved uses and existing commitments; creating the function does not generate another allocation or permission to redirect housing money to energy or industrial purchases. Obtain written funder guidance and consent where required before changing purpose. [24] If an applicable restriction or required consent is unresolved, stop before commitment rather than merely disclose uncertainty in the report.

FCM's federally funded Green Municipal Fund provides current opportunities for eligible sustainability projects, including municipal buildings and energy systems. Some capital offers combine loans and grants, so the loan must remain a repayable obligation. Test the actual project, applicant, ownership, environmental outcomes and intake rules before applying. This paper assumes zero unawarded grant revenue and makes no promise that GMF will fund general land purchases. [31]

Staff should maintain a funding register for relevant federal, provincial, school-board or other public-property opportunities and project programs. Confirm availability and terms at application; distinguish a national announcement from an allocation. Avoid spending before an agreement permits it, double claiming eligible costs or transferring a funded asset without consent. Funders' security, reporting and clawback duties must survive any change in administrative or corporate structure.

Illustrative parcel pressure test

Assume a purchase of \$1.0 million, \$150,000 of diligence and preparation, \$400,000 of remediation and \$100,000 annual holding and financing cost for two years. Total exposure is \$1.75 million before sale costs or public infrastructure. A \$1.6 million sale leaves a \$150,000 shortfall before transaction costs. One additional holding year and a 15% fall in that sale value increase the shortfall to \$490,000. These are hypothetical inputs; they demonstrate why acquisition price alone is a poor measure of success. The simplified example excludes applicable tax/HST effects, transaction and appraisal-refresh costs, enforcement, unrecoverable studies beyond the stated allowance and any restoration obligations. Add these to an actual case; the arithmetic is not a complete acquisition budget.

Finance should report cash exposure, economic cost and municipal accounting treatment separately. Sunk diligence cannot justify further spending if the future case has deteriorated. A project should proceed only when its remaining benefit warrants its remaining cost and risk.

12 Staffing and avoiding unnecessary bureaucracy

Start with accountable capacity, not a large new department. A proposed pilot requires one experienced portfolio lead and one GIS/property analyst, supported by named staff time from transactions, finance, legal, planning, facilities and engineering. An additional half-time transaction or project coordinator may be justified after workload review. These are proposed capacity requirements; assess redeployment, vacancies and service impacts before adding positions. The capacity and offset analysis in Section 11 must precede a recommendation for permanent new positions. A reassignment that creates equivalent backfill elsewhere is not a saving.

The lead should manage the portfolio, deadlines and Council reports, rather than personally perform every professional assessment. The analyst should reconcile property data and maintain evidence and public reporting. Program sponsors prepare service cases. Independent qualified professionals provide appraisal, environmental, engineering and specialized building advice. Procure that expertise through current municipal rules; existing professional rosters may reduce setup costs where their scope permits.

Use a single case file and committee review for material decisions. Circulate questions together rather than create serial approvals. Standardize templates and combine related studies without weakening scope. Set service targets for departmental responses and escalate unresolved conflicts to the CAO. Maintain separate statutory planning processes so coordination does not compromise independent approvals.

A low-risk remnant transaction can follow a simplified checklist and existing delegation. A contaminated redevelopment requires full gates. Staff should measure hours, repeated studies, turnaround, exceptions and delivery outcomes. At the 12-month review, Council must require evidence that the function has reduced fragmentation, duplicated studies, idle carrying exposure or project delays. If its administrative cost exceeds the measurable value it creates, or it merely duplicates existing processes, Council must resize or terminate it. Preserve essential property records and legally required work when closing the pilot. A permanent office must earn its cost; transaction volume alone does not prove success.

Approve the bureaucracy-test definitions and evaluation plan before commencement; establish the measured baseline within 90 days using the existing process and available pre-pilot records. For comparable cases, record staff hours and cost, separate registers and repeated entries, duplicate studies and cost, idle carrying exposure, gate turnaround and service access/outcomes. Record workload and causes of delay so statutory, market or contractor delays are not credited to administration. At the 12-month review, compare like-for-like cases with that baseline and a credible continuation of the former process. Publish coverage gaps and attribution limits rather than manufacture savings.

Report the first 12 months' full startup cost and ongoing administrative cost separately, their cumulative total, gross program cost and net incremental municipal cost. Also report the recurring administrative run rate and a distinct next-12-month forecast; startup costs must not disappear from the cumulative test. Keep approved land, infrastructure and intentional service/subsidy expenditure separate from administrative efficiency, without excluding it from total municipal exposure. Any longer project-outcome horizon must be stated in advance and does not postpone the mandatory 12-month decision.

Count realized cash savings only when expenditure is actually avoided; report released capacity in verified hours and service outcomes against agreed access, quality and timeliness measures. Do not label reassigned time as cash. Avoided bad transactions require a documented changed decision, a credible counterfactual and independently reviewed, bounded exposure avoided; the asking price alone is not a saving. Count each benefit once and distinguish forecast from realized results. Finance verifies attribution and the independent review tests it. Speculative appreciation or vague future benefits cannot pass the test. If administrative cost exceeds demonstrable value or processes merely duplicate existing work, Council must resize or terminate the function while preserving required records and lawful work.

13 Conflicts political influence and public reporting

Council sets policy and makes reserved decisions through the lawful public process. Individual political offices should not negotiate private preferences for a buyer or instruct staff to alter an appraisal, skip diligence or favour a bidder. Record substantive external contacts, requested changes and responses in the file. A Council decision to depart from the recommended use must disclose reasons and costs; technical and statutory requirements remain in force.

Apply the Council Code of Conduct, employee rules and statutory conflict requirements, with transaction-specific declarations by staff, councillors, consultants and any board members. Disclose interests involving family, business partners, beneficial owners and counterparties to the extent required by law and the adopted policy. Require recusal and replacement reviewers. Confidential knowledge must not be used to acquire nearby land or benefit another party. The municipality already maintains an Integrity Commissioner framework. [32]

Proposed transaction rules should prohibit evaluators from accepting gifts, commissions or success fees from counterparties. Brokers, appraisers and advisers must disclose material relationships. Obtain beneficial-ownership information from prospective purchasers and partners appropriate to the transaction and protect personal information. Require independent review of related-party deals and a competitive process unless a documented lawful exception applies. Campaign support must never form part of a scoring criterion.

Open Council discussion should cover mandate, selection criteria, public benefit, subsidy and final material decisions. Closed discussion may be lawful for particular acquisition, disposition, negotiating or privileged matters; it is not a blanket exemption for all Land Bank business. The Clerk should identify the applicable exception and comply with meeting rules. Release decision information when confidentiality no longer requires withholding, subject to privacy and privilege. [33]

Quarterly and annual disclosure

Publish a quarterly portfolio dashboard showing assets by legal control and use category, readiness stages, diligence expenditure, annual carrying cost, committed and forecast capital, liabilities, realized net sale and lease receipts, assistance, delayed projects and completed public outcomes. Report asset counts and area without treating them as benefits. Distinguish verified facts from estimates and show changes since the last quarter. Include gross program cost, net incremental municipal cost, forecast and realized offsets, MIIF advances and recoveries, and the reconciliation that prevents double-counting. For facilities proposals, report geographic service access before and after the change. Show portfolio liquidity, cumulative housing-capacity losses and replacements, restricted-purpose changes, existing commitments and the baseline comparison for administrative value; distinguish gross entity exposure from net external exposure.

For each completed material transaction, publish a plain-language decision record identifying the property, approved use, process, counterparty, market-value basis, consideration, public assistance, obligations and milestones, subject to lawful redactions. Report extensions, defaults, enforcement and recovery. A public summary should explain any withheld information category rather than imply complete disclosure of a confidential file.

Commission an annual independent sample review of transactions and controls, with audit scope approved through the municipality's governance process. Test approvals, valuation independence, funding restrictions, conflict declarations and milestone enforcement. Publish findings and corrective actions. Corporate financial statements alone would not establish that public value was achieved.

14 Pressure tests and stop conditions

Every material acquisition, lease or preparation project should be tested against realistic adverse outcomes before commitment. The following proposed tests apply to the administrative model and any later corporation. A favourable overall score cannot compensate for a failed legal or affordability test.

Risk or adverse scenario	Test and required response
Political preference overrides evidence	Document competing uses and scoring; retain independent certifications. Publish the cost of a lawful override. Stop if the requested action is unlawful or unfunded.
Speculative acquisition or inflated asking price	Compare owned sites, conditional control and doing nothing. Require independent value and a defined public need. Do not buy on projected appreciation alone.
Remediation costs double or contamination expands	Model the full range, migration, monitoring and cleanup obligations. Acquire only with bounded exposure and funding or an enforceable alternative; otherwise decline.
Demand or sale value falls 15%	Recalculate net public cost and holding capacity without speculative appreciation. Resize, stage, retain for a justified use or exit through Council.
Delivery is delayed 12 or 24 months	Include holding, financing, security and revenue delay. Require a funded extension and revised milestone; stop unfunded discretionary work.

Risk or adverse scenario	Test and required response
An assembled parcel cannot be completed	Test missing access, last-owner refusal and unusable remnants. Use conditions or options; require a viable fallback before irreversible closing.
Buyer or partner defaults	Check financing, experience, performance security and remedy enforceability. Step in only within approved authority and exposure; enforce recovery or retender. Model lender priority, insolvency, option expiry, appeal delay, actual net recovery, enforcement expense and funded repurchase; remedies on paper alone do not pass.
Below-market transfer becomes private windfall	Value all assistance; impose use and delivery obligations, resale/assignment controls and recovery. Refuse terms that cannot protect the approved benefit.
Housing and jobs compete for scarce land	Compare substitutes, servicing, actual demand and purpose restrictions. Council decides with a public opportunity-cost account, not a departmental first claim. Test scarce utility capacity and the shortage of realistically substitutable serviced employment sites; forecasts alone are insufficient.
Long energy lease prevents better future use	Model industrial and municipal alternatives, lease duration, delayed operation and restoration. Protect deadlines and security before granting long control. A proposed municipal energy company receives no automatic priority.
Grant is denied or repayment is triggered	Use zero speculative grant revenue. Do not replace lost support silently with reserves; return revised scope and exposure to Council.
Facility reuse requires expensive service relocation	Include replacement service, moving users and conversion. Reject a nominally cheap property solution that raises total public cost without greater benefit. Test rural access, lease termination and transition costs; low use alone cannot justify disposal. Quantify travel time, hours, accessibility and transport barriers; no claimed saving may omit a funded replacement service.
Conflict or insider information emerges	Recuse affected decision-makers, preserve records and obtain independent review; use enforcement channels. Pause the affected award or closing where legally available.
Administrative cost exceeds useful workload	Apply the approved baseline and 12-month evaluation: full startup and ongoing cost, realized cash savings, verified released capacity, service outcomes and documented avoided bad transactions. Count benefits once. Resize or terminate if administrative cost exceeds demonstrable value or processes duplicate existing work.
Several parcels fail simultaneously	Combine doubled remediation, delayed disposals, lost recoveries and zero new grants across the portfolio. Show peak external cash demand, reserve floors and competing capital commitments. Cap exposure, stage or stop before liquidity is breached.

Risk or adverse scenario	Test and required response
Repeated changes erode housing land	Report cumulative loss of housing-suitable capacity, replacement cost and actual replacement delivery, alongside other purpose-specific losses. Apply existing housing-retention requirements; repeated public-value overrides cannot evade them.
Reuse conflicts with existing commitments	Test executed leases, renewal/option rights, condominium and shared-system obligations, construction contracts, funder restrictions and approved financing assumptions. Price consent, termination and damages; decline an unlawful or unfunded change.
Election transition changes authority	Check current Council, mayoral and delegated authority against applicable election restrictions before commitment and on transition. Reconfirm the matrix; pause a decision lacking lawful authority.
Connected deals evade a threshold	Aggregate related parcels, options, deposits, renewals and phased commitments under the proposed policy. Independently review classification and total exposure; no splitting to avoid approval or appraisal.
Incorrect data or readiness status	Reconcile title, leases and control classifications; restrict and log changes to certified readiness. Investigate missing obligations or unauthorized status changes before release.

A compound test should combine remediation at twice the estimate, a 24-month delay, lower disposal value and zero new grant. Show peak exposure and municipal capacity to absorb the result. Do not rely on separate mild tests that never occur together. A project can justify an intentional net public cost, but Council must approve that cost as assistance or service expenditure rather than label it an investment return. Run the same compound scenario across concurrent parcels, not only one hypothetical site, and show cash shortfalls before discretionary commitments crowd out approved services or capital needs. Include secured-lender priority, enforcement and closure expense; nominal collateral is not liquidity.

The recommended hard stops are no lawful authority or approved funding, unresolved control needed for the intended use, unresolved funder restrictions or required consent, material unbounded environmental risk, no credible source for the maximum commitment or portfolio liquidity need, no executable delivery or retention plan, or a counterparty unable to meet essential obligations. A stopped project requires a closure or retention decision and a public account of money spent. Ending a weak proposal is a valid stewardship outcome.

15 The first 90 and 180 days

Milestones begin only on lawful authorization, approved funding and available assigned capacity, not publication of this campaign paper or an assumed election result. Check election-transition and organizational authority before commencement. The first six months establish control and evidence; they do not guarantee completed remediation, rezoning, sale or construction.

Period	Deliverables	Decision and accountability
Days 1 to 30	Appoint lead; confirm staffing and capped funds; map owners and delegations; collect current policies; identify records, commitments and high-risk holdings. Identify reassigned capacity, backfill and potential offsets before new staffing. Name the actual appropriation source and permitted scope; certify the current authority matrix and election-transition applicability before commitments. Approve evaluation definitions and a resourced schedule.	CAO and Treasurer return the funded work plan and current authority map. No speculative acquisition.
Days 31 to 60	Reconcile property lists and GIS; classify ownership and use; establish confidence flags; draft public-use, valuation, conflict and gate standards; select a small varied diligence sample. Establish the bureaucracy-test and geographic service-access baselines. Draft the parcel/project accounting protocol and portfolio liquidity test; distinguish startup and recurring cost.	Departments certify submissions. Legal and Finance identify restrictions and required policy amendments.
Days 61 to 90	Publish baseline register and coverage gaps; report current carrying exposure; assess existing safeguards and fragmentation; consult on mandate; deliver draft policies and costed annual scope. Report gross and net incremental cost and verified versus forecast offsets.	Council approves or revises pilot scope, delegations and remaining appropriation. Unverified entries remain visibly provisional. Any further appropriation requires the adopted protocol, phased cost bridge and portfolio stress test; existing transaction authorities remain unchanged.
Days 91 to 120	Investigate three to five proposed pilot assets across different uses; commission bounded studies; prepare comparable use and lifecycle cases; confirm partner interest without promising awards. Include a major-building consolidation and reuse comparison where warranted.	Lead reports gate status and issues. Select only candidates warranted by evidence.
Days 121 to 150	Complete available technical cases; test funding and transaction routes; prepare public-use recommendations and agreement protections; assess workload and service impact. Reconcile proposed MIIF funding, parcel costs and recoveries; test purpose changes.	Finance and Legal certify decision evidence. Unresolved engineering or approvals delay release. Unresolved funder restrictions or required consent stop commitment; no deadline overrides a gate.
Days 151 to 180	Present first portfolio plan, retention/disposition choices, readiness dossiers, funding needs and quarterly dashboard; recommend continue, resize or stop individual cases. Present the cost bridge, service-equity effects and measures for the 12-month review.	Council makes parcel-specific decisions. Any corporation proposal remains a separate business case and consultation.

The baseline should reconcile all known municipally owned parcels and buildings against source systems and publish exceptions. Full title diligence on every active asset within 90 days is neither required nor credible; prioritize transactions and material risks. Report inventory coverage by verified owner, source reconciliation and unresolved records, not a fabricated completeness percentage. The 30-day work plan must identify hours, responsible staff, procurement and consultant lead times, seasonal/site access, utility response times and required approvals. If the schedule is not achievable, disclose the constraint, cost and revised evidence date; do not force a readiness designation or promise unbudgeted capacity.

The proposed three-to-five-asset pilot should include varied questions, such as a constrained site, a facility transition, an industrial holding and a lease opportunity. Existing commitments govern selection. Minnie, Lacroix and the energy sites are case-study candidates for review, not new approvals or a direction to renegotiate executed contracts. Routine disposals should continue under lawful rules while major cases enter the gates.

At 180 days, Council should have a usable register, approved decision rules, known carrying exposure and several evidence-based choices. Where a site is not ready, the dossier should name the remaining work, cost and decision date. Within 12 months, review outcomes and staffing before deciding on a permanent office or corporation. A site delayed by missing evidence remains at its gate. Council must receive the accounting protocol, liquidity test, phased cost bridge and bureaucracy-test baseline with further scope or appropriation requests.

16 Measures of success

Measure benefits by use. Housing outcomes include occupied homes and the duration and cost of affordability. Employment outcomes include completed facilities, verified jobs where contracted and actual serviced land taken into use. Infrastructure outcomes include service delivery, reliability and lifecycle value. Energy outcomes include realized net lease income, operating status and secured restoration. Community outcomes include sustained access, operator viability and service use.

Portfolio measures should include inventory accuracy, elapsed time between gates, avoided duplicated studies, public cost per delivered outcome, idle carrying exposure, enforceable obligations, defaults and recovery. Set baselines before claiming savings. Compare the Land Bank with the previous process and realistic alternatives. Acres acquired, studies commissioned and announcements made are activity measures, not delivered public value. The 12-month review must apply the measurable bureaucracy test in Section 12, including the mandatory resize-or-terminate response to excessive cost or duplicated processes.

Report unsuccessful investigations as well as successful transactions. A modest study that prevents a bad acquisition may be valuable; demonstrate the decision it changed. Conversely, a long list of deferred properties should trigger review of the program. Public confidence depends on showing both costs and results.

17 Proposed Council direction

The following is proposed direction for a policy pilot. The Clerk and Legal Services must prepare lawful adoption instruments consistent with current authority, existing commitments and applicable organizational and election-transition powers. Proposed thresholds and delegations take effect only through their own lawful adoption.

1. Establish a Chatham-Kent Municipal Land Bank administrative coordination pilot for a municipality-wide property register, public-use assessment and readiness analysis across housing, economic development, infrastructure, energy and community purposes, through the lawful organizational process.

2. Require the CAO and Treasurer to present a staffing, current authority and funded work plan within 30 days. Any initial allocation must be an actual appropriation of up to \$150,000 of incremental planning and diligence expenditure for the first 90 days, with a named source and budget account, permitted scope, spending ceiling and monthly and 90-day reporting conditions. No source is assumed available. Exclude land transactions, physical site preparation, permanent new positions and commitments beyond the approved pilot unless separately authorized. Identify reassigned capacity, backfill, eliminated duplication and credible offsets; report gross and net incremental cost.
3. Require departments and relevant municipal entities to reconcile known property interests and commitments, with legal ownership and decision rights preserved. Publish a 90-day baseline report, register, process map and gaps in verified coverage. Require the Clerk/Legal authority matrix to cover approving bodies, delegated officers, signing and budget authority, notices, amendments, mayoral organizational powers and applicable 2026 election-transition restrictions; certify it before any binding commitment.
4. Draft unified public-use, acquisition, valuation, disposition, ground-lease, conflict and readiness rules building on existing instruments, explicitly including By-laws 92-2020 and 228-2021. Existing affordable-housing retention, housing-provider review, notice, long-lease and exemption requirements remain applicable unless lawfully amended or waived through their applicable process. Bring proposed changes to Council openly. Include purpose retention, major-building consolidation/reuse and geographic service-equity tests.
5. Require costed servicing and major constraints before any claim of shovel readiness. Treat the six gates as evidence requirements, not transaction, spending or statutory approval authority. Draft any proposed reservation of material acquisitions, purpose changes, assistance, strategic long leases and major capital commitments through a separate lawful instrument; existing powers remain unchanged until then.
6. Apply existing valuation/appraisal requirements and propose additional independent safeguards that never reduce them. Require assistance disclosure and transaction-specific legal authority, including the recipient and ultimate beneficiary. Resolve funder restrictions, provincial rights and required consents before commitment. Treat municipal corporations as proponents without automatic property priority and assess their actual statutory framework. Require an adopted parcel/project accounting protocol covering appropriations, capitalization, advances, transfers, entities, guarantees, contingent liabilities and recoveries; approve MIIF financing separately and count expenditures and recoveries once.
7. Deliver a 180-day portfolio plan and bounded pilot recommendations, with lifecycle alternatives, cash-flow exposure, pressure tests, delivery or retention plans and enforceable public-benefit obligations. Include simultaneous-failure and liquidity tests, existing commitments, cumulative housing-land effects, realistic enforcement and full-term or explicit terminal-value/restoration analysis for obligations beyond 20 years. Further appropriation requires the protocol and phased cost bridge.
8. Publish quarterly progress and annual independent control-review findings. Approve the bureaucracy-test definitions before commencement and establish the baseline within 90 days. At 12 months compare the former process with full startup and ongoing administrative cost, realized cash savings, verified released capacity, service outcomes and documented avoided bad transactions, with independent attribution review. If administrative cost exceeds demonstrable value or processes merely duplicate existing work, resize or terminate while preserving essential records and lawful work. No speculative future benefit may defer that decision.
9. Do not establish a new municipal corporation or transfer land to one through this authorization. Consider incorporation only through a separate adopted business case, required public consultation, compliant transfer policy and Council decision. Distinguish a section 203 Land Bank MSC from an electricity corporation under its applicable Electricity Act framework; no entity's establishment or financing is presumed approved.

This authorization grants no new authority to acquire land, enter options or leases, dispose of assets, undertake physical site preparation, borrow, guarantee obligations or establish a corporation. Existing lawful authorities remain unchanged.

18 What the Land Bank changes

- Know the full public portfolio and its obligations before deciding what to retain, prepare, lease or sell.
- Compare public uses with market value, lifecycle cost and realistic alternatives; explain the tradeoff.
- Prepare and cost sites before making delivery promises, using public investment only where it earns a public benefit.
- Protect land and subsidies through independent valuation, conflict controls and enforceable agreements.
- Start with accountable administration and expand only when delivered results justify the cost.

Sources and evidence register

Original sources were checked September 30, 2026; the Draft 3 authority and procurement-status updates were checked October 1, 2026. Numbered references retain primary municipal, provincial and program sources unless stated otherwise. Reference 26 is attributed secondary reporting for the firehall footprint. The notes distinguish direct documents, indexed primary extracts and historical evidence; public-source verification is not certification of title, executed agreements or current delegated authority. These require the transaction records and Clerk/Legal review described above.

[1] Municipality of Chatham-Kent. Asset Management Plan page. Infrastructure scope and current linked planning reports. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.

[2] Municipality of Chatham-Kent. Facilities Services Detailed Asset Management Plan 2025. PDF pages 4 to 9; facilities registry, responsibilities and distinction from housing building assets. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.

[3] Municipality of Chatham-Kent. Surplus Municipal Properties. Current public listing and Property Disposition contact. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.

[4] Chatham-Kent Council. Minutes August 11 2014. PDF pages 23 to 26; historical disposition process, By-law 100-2012 and industrial pathway. Obtain the current consolidated disposition bylaw from the Clerk before implementation. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026. Historical pathway only; current rules are cross-referenced at 43-46.

[5] Chatham-Kent Council. Special meeting minutes December 20 2021. Annual disposal review with Housing and Planning and feasibility direction for municipal housing sites. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026. Historical minutes; the enacted housing-retention amendment is separately identified at 44.

[6] Chatham-Kent Economic Development. Bloomfield Business Park. Servicing description and conditions for development and reacquisition; confirm actual sale agreement and current availability. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.

[7] Municipality of Chatham-Kent. Development Review Process. Planning application and approval pathway. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.

[8] Municipality of Chatham-Kent. Strategic Housing Action Plan May 2026. Housing goals and land and development measures; a sector strategy rather than the full Land Bank mandate. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.

[9] Municipality of Chatham-Kent. Asset Transfer Policy revised December 10 2012. One-page policy; valuation, Council approval, conditions, assistance disclosure and provincial rights. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.

[10] Municipality of Chatham-Kent. Purchasing By-law 19-2026. Passed February 23, 2026; repeal, conflict provisions and Schedule A real-property exemption. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.

[11] Municipality of Chatham-Kent. Debt Management Strategy revised November 27 2023. Sections 2, 3 and 8; financing principles. Historical balances are not used as current financing capacity. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.

[12] Municipality of Chatham-Kent. Reserves and Reserve Funds Policy. Existing municipal reserve framework. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.

- [13] Municipality of Chatham-Kent. Asset Retirement Obligation Policy. Existing accounting framework relevant to end-of-life obligations. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.
- [14] Ontario Ministry of Municipal Affairs and Housing. Municipal councillors guide Chapter 7. Municipal lawmaking and natural-person powers. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.
- [15] Ontario Ministry of Municipal Affairs and Housing. Municipal councillors guide Chapter 8. Delegation and exercise of municipal powers. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.
- [16] Government of Ontario. Ontario Regulation 599/06 Municipal Services Corporations. Current consolidation; sections 3, 6 to 8 and 11 to 21. Business case, consultation, transfers, restrictions, information and conflict treatment. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026. Section 203 route only. Sections 6–8 and 14–15 require transaction-specific assessment; not the automatic framework for electricity corporations.
- [17] Government of Ontario. Municipal Act 2001. Sections 6, 9 to 11, 23.1 to 23.5, 106, 107, 110, 203, 239 and 270. Confirm current provisions for each transaction. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026. Also sections 5(3), 203(3), 270(1), 275, 284.5, 284.6 and 284.13; apply with 48–49 and current certified local authority.
- [18] Ontario Ministry of Municipal Affairs and Housing. Municipal councillors guide Chapter 9. Municipal finance and business-assistance restrictions. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.
- [19] Municipality of Chatham-Kent. Official Plan page. Land-use objectives and implementation instruments; use current amendments and maps for each parcel. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.
- [20] Municipality of Chatham-Kent. Community Improvement Plan November 2025. Published municipal plan; transaction-specific eligibility and amendments require confirmation. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.
- [21] Government of Ontario. Expropriations Act. Approval and compensation framework; use current consolidation. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.
- [22] Ontario Ministry of the Environment. Brownfields redevelopment and Record of Site Condition guidance. Environmental assessments and use-change requirements under the applicable framework. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.
- [23] Municipality of Chatham-Kent. Affordable Housing Build 199 Westcourt Boulevard staff report August 2024. Printed page 3; Minnie concepts, approved funding and servicing estimate. Primary report text verified through indexed municipal extract; direct download was unavailable. [Source link](#) Verification: Indexed primary-source extract, September 30, 2026.
- [24] Municipality of Chatham-Kent. Purchase of former St Ursula School announcement November 2025. Housing purpose, area, announced price and HAF-backed reserve source. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026. Announcement evidence; registered title, closing and actual allocation/disbursement remain unverified.
- [25] Municipality of Chatham-Kent. R26-271 Fire Station 1 Design Services. Tender description and September 15, 2026 award status at 426 Lacroix. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.

- [26] Pam Wright Local Journalism Initiative The Chatham Voice. New firehall heads to design stage September 23 2026. Secondary authoritative local reporting; attributed approximately 1.1-acre footprint, not a certified site plan. [Source link](#) Verification: Secondary attributed report, September 30, 2026.
- [27] Municipality of Chatham-Kent. Community Hub project page. Documented consolidation and current project context. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.
- [28] Municipality of Chatham-Kent. Community Hub frequently asked questions. Published reuse and surplus-process explanation; some project FAQs reflect earlier stages and are not used for present costs or timelines. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.
- [29] Chatham-Kent Economic Development. Park Avenue East and Sass Road. Expressly identified private development; demonstrates ownership distinction. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.
- [30] Chatham-Kent Council. Minutes October 6 2025. FLT Ridgeway and Bothwell lease and municipal-support resolutions; terms do not establish execution or operation. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026. Executed leases, amendments, payment frequency and current status remain unresolved; later selected-project evidence is at 50.
- [31] Federation of Canadian Municipalities. Green Municipal Fund current funding pages. Federally funded sustainability opportunities and combined loan/grant distinction; no allocation assumed. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.
- [32] Municipality of Chatham-Kent. Council Code of Conduct. Existing ethics and Integrity Commissioner framework. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.
- [33] Ontario Ombudsman. Open Meetings Guide for Municipalities. Open-meeting obligations and limits on land and negotiation exceptions. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.
- [34] Municipality of Chatham-Kent. Growth Management Official Plan project page. July 2026 municipal planning update and supporting employment and servicing studies. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.
- [35] Municipality of Chatham-Kent. Chatham-Kent Community Hub staff report January 2024. Printed page 3; dated floor-area descriptions and basement flood constraint. Relevant text verified through indexed municipal extract; direct PDF download unavailable. [Source link](#) Verification: Indexed primary-source extract, September 30, 2026.
- [36] Municipality of Chatham-Kent. Emergency Transitional Cabin Program Location April 8 2024. Printed page 7; ownership, Health and Human Services use and courthouse lease constraints at 435 Grand Avenue West. Confirm current executed lease and amendments. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026. Executed lease and amendments, present boundaries and consent rights remain unresolved.
- [37] Municipality of Chatham-Kent. Applying for Social Assistance. Current Employment and Social Services office location at 435 Grand Avenue West; not a floor-area or spare-capacity assessment. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.
- [38] Municipality of Chatham-Kent. Affordable Homeownership. Current Housing Services office location at 435 Grand Avenue West; no Land Bank income or buyer-assistance allocation assumed. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.

- [39] Municipality of Chatham-Kent. RFP Award Contract R25-371 Park Avenue Business Centre Building Renovations April 27 2026. Background on partial municipal ownership, condominium interests and shared fire protection; recommendations do not establish completed works. Relevant primary text verified through indexed extract. [Source link](#) Verification: Indexed primary-source extract, September 30, 2026. Unit title, declaration and actual contract commitments remain unresolved.
- [40] Chatham-Kent Council. Combined Council meeting agenda April 27 2026. Council Chambers address at 315 King Street West and Park Avenue renovation report on the agenda; not proof of asset availability. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.
- [41] Chatham-Kent Public Health. Contact Us. Current Grand Avenue, clinic and dental-office locations; supports service-relationship review without assuming property ownership or spare space at other locations. [Source link](#) Verification: Published primary-source text or linked document, September 30, 2026.
- [42] Municipality of Chatham-Kent. Council Policies page. Published listing of disposition By-laws 92-2020 and 228-2021; Clerk certification of the complete current instruments is still required. Verification: Published municipal page; checked September 30, 2026. [Source link](#)
- [43] Municipality of Chatham-Kent. By-law 92-2020, finally passed July 20 2020. Sections 1, 3-5, 7-12, 16 and 18-24: disposition, valuation, notice, exemptions and industrial provisions. Read with 228-2021 and any certified further amendments; not a certified consolidation. Verification: Direct primary PDF; checked October 1, 2026. [Source link](#)
- [44] Municipality of Chatham-Kent. By-law 228-2021, finally passed December 20 2021. Amends 92-2020 section 4(a): Housing and Planning review and retention of affordable-housing-suitable land. The applicable enacted rule is not replaced by this proposal. Verification: Direct primary PDF; checked October 1, 2026. [Source link](#)
- [45] Municipality of Chatham-Kent. By-law 7-2024, finally passed January 15 2024. General delegation conditions and Schedule A; distinguish signing, substantive approval and budget authority. Obtain certified amendment history and current mayoral instruments. Verification: Direct primary PDF; checked October 1, 2026. [Source link](#)
- [46] Chatham-Kent Council. January 27 2025 Combined Council meeting agenda. Contains proposed amendment material concerning 7-2024. The agenda alone does not certify adoption, amendment number or the current consolidated delegation framework. Verification: Indexed primary agenda; checked October 1, 2026; full certified enactment unresolved. [Source link](#)
- [47] Government of Ontario. Electricity Act 1998. Section 142 electricity-corporation route; compare Municipal Act 203(3). Current entity-specific incorporation, transfers, finance and regulatory requirements require legal assessment. Verification: Indexed primary e-Laws text; checked September 30, 2026; direct access blocked on October 1. [Source link](#)
- [48] Government of Ontario. Ontario Regulation 530/22, Part VI.1 of the Act. Strong-mayor framework; read current consolidation with June 2026 amendment 189/26 and Municipal Act provisions. Applicability of transition restrictions must be determined, not assumed. Verification: Indexed primary e-Laws text; checked September 30, 2026; direct access blocked on October 1. [Source link](#)
- [49] Government of Ontario. Ontario Regulation 189/26, amending 530/22. June 2026 election-transition changes concerning specified outgoing-mayoral powers and following-year budget timing; assess the actual statutory conditions before action. Verification: Indexed primary e-Laws text; checked September 30, 2026; direct access blocked on October 1. [Source link](#)

[50] Independent Electricity System Operator. LT2 energy-window 1 final selected-project results, May 8 2026. Neither Ridgeway nor Bothwell appears in the selected-project table. Absence does not establish cancellation, lease termination or inability to pursue another procurement. Verification: Direct primary PDF, all four pages; checked October 1, 2026. [Source link](#)

Before implementation or commitment, obtain the Clerk-certified disposition/delegation instruments and amendments, current organizational and election-transition authority, title and closing records, actual funding ledgers and executed funder agreements, executed leases and amendments, consent records, condominium documents, current capital contracts and dated servicing evidence. Unresolved questions remain unresolved; the register is not permission to assume an asset or funding is available.