

**THE CORPORATION OF HALDIMAND COUNTY
COUNCIL IN COMMITTEE - DECEMBER 22, 2008**

In the Matter of a Proposed Zoning and Official Plan Amendment
to Permit a Natural-Gas Fuelled Electric Generating Station

Official Plan Application OP-HA 3/2008
Zoning Application Z-HA 28/2008
CPV CANADA DEVELOPMENT, Proponent
Lot 7, Concession 4, Walpole, Now in Haldimand County
768 Haldimand Road #55
Roll No. 2810-332-003-02600

SUBMISSION OF THE CAE (Clean, Affordable Energy) ALLIANCE

The CAE Alliance is an energy ratepayers' organization representing the environmental and economic interests of Haldimand residents, businesses and area workers, as well as the larger interests of the residents and ratepayers of Ontario.

Information provided for consideration by Council in Committee, contained in "Report PED-PD-78-2008 of the General Manager of Planning and Economic Development" (Report 78-2008) forms the basis for recommendations for Council to approve the requested Official Plan and By-Law changes for the above noted project.

It is evident that the Mayor, Council and the Planning and Economic Development department of the County of Haldimand have the commendable goals of preserving and enhancing the economic development of the community. Concern for the environmental and natural implications of this proposed project is equally evident. The CAE Alliance however believes that there is additional information relevant to this application and submit the following for your consideration:

1. The residents of Haldimand will be worse off as a result of embracing the proposed natural gas project.

(i) Loss of jobs

According to Report 78-2008, "The generation capacity would be approximately one third of what is produced at the Ontario Power Generation coal-fired plant in Nanticoke ... and would have an operational labour force of approximately 30 full time employees."

This project in conjunction with natural gas power plants proposed for the Kitchener/Waterloo area will effectively replace the Nanticoke Generating Station. Haldimand County and surrounding communities will lose 600 highly skilled, well-paying jobs. These 600 workers represent families, many with dual income earners. Therefore, there will be a much higher number of lost incomes when these families relocate. The job losses will be further compounded by the loss of contractor positions and temporary trades workers, numbering in the hundreds.

The "30 full time" positions at this proposed gas plant will not compensate.

(ii) Loss of Community Income and Volunteer Assistance

◆ "Nanticoke employees also have a long tradition of volunteer service and fundraising for the community. ... the station also supports a variety of local environmental, educational and community projects. In recent years, OPG has donated more than \$200,000 to community hospital foundations, environmental conservation projects, community events, youth sports programs, cultural organizations and other community initiatives. In addition, through the employee Charity Trust campaign, Nanticoke employees set high standards of giving by donating to local charities of their choice." (opg.com)

The "30 full time" employees at this proposed gas plant cannot compensate, regardless of how dedicated they may be.

◆ The 600 families purchase goods and services in the community, and "OPG annually purchases more than \$6 million in goods and services from regional businesses". (opg.com)

◆ Nanticoke Generating Station makes a significant contribution to the local tax base. It is important to note that, as a result of a replacement natural gas facility coming on line this fall in St. Clair Township, Lambton County, the county is facing economic shortfalls. The following is an excerpt from the local MPP, Bob Bailey, questioning the Minister of Energy (Hansard Transcript), November 17, 2008:

"Mr. Robert Bailey: My question is for the Minister of Finance. Minister, last week St. Clair township, a municipality in my riding, was shocked to learn that MPAC has arbitrarily reduced the assessment of the Lambton generating station by 47% for this year. This means that with a stroke of a pen, 17% of the tax base of St. Clair township has been wiped out. St. Clair township did not see this coming and now will be struggling to meet their 2009 budget. ...

Hon. Dwight Duncan: I'm proud of the fact that the McGuinty government is building two new gas-fired plants in the Sarnia area that will replace the coal-fired generation. ...

Mr. Robert Bailey: ... In 2008, St. Clair township had a total combined budget of just over \$6 million, of which the Lambton generating station accounted for \$2.3 million. In 2009, the generating station's portion of the tax levy will slip to \$1.13 million, a \$1.17-million reduction off of a \$6-million budget. This means that the residents of St. Clair township are now looking at an average 17% tax increase just to provide those same services in 2009."

An area newspaper reports that *"The (MPAC) ruling was made based n the provincial government's stated intention to close the Lambton Generating Station in December, 2014. ... it will translate into a taxation loss of about \$730,000 in 2009 due to the assessment reduction. ... The logic is that the provincial government intends to close the plant in 2014 so depreciation begins next year. ... the facility currently comprises 28% of the municipality's tax revenue...."* (The Beacon)

Lambton Generating Station is ½ the size and generating capacity as Nanticoke Generating Station.

* It is worth noting that the Haldimand County has not received comments from MPAC as to what revenue can be expected from the proposed natural gas generating facility. (Page 20 of Report 78-2008)

2. Natural gas-fired generation has a significant and negative impact on the price of electricity. (There are differing cost evaluations associated with natural gas generation noted below, depending on the price of natural gas at the time the information was provided. This is an indication of the volatility of natural gas pricing. What is clearly evident however is that power prices from natural gas-fired generation are 2 to 3 times higher than that of coal-fired generation, and as high as 5 times that of coal.)

(i) Impact of Switching Coal to Natural Gas

◆ According to Ontario Power Authority information, in 2010 the cost per MWh (median scenario) of coal-fired generation will be \$37.00/MWh; new gas-fired generation will be \$200.00/ MWh.

◆ For every 10% increase in natural gas prices, Ontario electricity spot market prices will increase by approximately 6%. (Navigant Consulting)

◆ The following chart is taken from a report prepared for the Ministry of Energy demonstrates the higher price of electricity using natural gas; almost triple the current price of coal-fired generation; double the cost if best emissions controls were used at Nanticoke Generating Station. (Cost Benefit Analysis: Replacing Ontario's Coal-Fired Electricity Generation, 2005)

Table 1. Levelised Cost of Electricity, \$/MW (Derived from Data in the DSS report)

Coal as is	Coal With Stringent Control	Coal Replaced With Gas @ 8.00USD @ 9.12CAD
\$37	\$51	\$102

◆ The full impact of the coal replacement with natural gas-fired generation was captured in the CIBC World Markets Report of July, 2007, which estimates that this move would cause electricity prices to rise 60%-70%, or roughly 6.5% per year. (“Can Ontario Shutdown Coal and Keep the Lights On?”, Benjamin Tal, CIBC World Markets Inc.)

(ii) Wholesale price of electricity

◆ As of April, 2009 the "MUSH" sector (municipalities, universities, schools and hospitals) will be required to pay the wholesale price of electricity. This means that this sector, currently protected under the province’s regulated rate protection plan will no longer be eligible for price protection. That will directly impact the Haldimand County budget.

◆ The market price for electricity, the OPG rebate or global adjustment available to consumers will all be significantly impacted by the inclusion of higher priced natural gas-fired generation. (For more information, see CAE Alliance submission to the Ontario Energy Board, available at www.caealliance.com) The cost implications are not so simple as merely replacing 20% of the provincial power production from coal-fired to natural gas-fired. The higher priced gas-fired power will set market price 85% of the time (up from the current 23%). The excess revenues from the capped coal-fired generation assets are rebated back to consumers. When private power generators produce power the revenues are pocketed, not put back into the public coffers.

◆ According to the National Energy Board, “When gas generation set the price, it is more than twice as high (about \$78/MW.h, versus about \$33/MW.h for coal). It follows logically that increased gas-

fired generation in Ontario will likely result in higher electricity prices due to greater frequency in setting the price of electricity ...”

◆ Industries in the Haldimand County will be impacted by higher wholesale electricity prices. The CAE Alliance has been actively involved in the provincial power planning process over the past 4 years, most recently with Intervenor status of the Ontario Energy Board's review of the proposed 20 year power plan. We have seen and heard the concerns from the industrial and manufacturing sector regarding higher energy costs and the impact on the competitiveness of Ontario industries. This province lost 66,000 jobs - 42,000 in the manufacturing sector - in November, 2008 alone! For every dollar invested in the manufacturing sector there is an additional \$3.05 in economic activity. Haldimand County will suffer additional losses as an indirect result of gas for electricity use.

3. There is uncertainty regarding the viability of the Project

◆ According to the Proponent, "The facility would operate continuously (24 hours per day, 7 days per week) to provide intermediate and baseload power and would have an operational labour force of approximately 30 full time employees."

However, the Ontario Power Authority (OPA) advises “Gas fired generation is not recommended for base-load generation because in that role it represents risks across all three dimensions of cost, environmental impact and financial risk.” and, “Do not use natural gas for base load generation, since this use results in higher exposure to natural gas price risks.” OPA indicates that “... volatility of price and uncertainty of supply are major drawbacks to gas-fired generation for base load.

◆ The Proponent does not have an existing power production contract with the OPA. Also, the location of this facility is outside of the jurisdictions considered for development by the OPA as set out in the Integrated Power System Plan (IPSP).

◆ From information set out in a consultant's report to the OPA, there is not sufficient natural gas transmission, storage, and distribution facilities for all of the planned gas-fired capacity included in the IPSP. This facility is outside of these estimates and it is therefore unlikely that sufficient infrastructure and resources will be available to allow the facility to "operate continuously".

4. There are concerns related to supply of natural gas.

All credible government and energy agencies, Canadian and international, confirm that North American natural gas production is in decline. Increasing demand for natural gas is now outpacing supply. (Refer to the CAE Alliance submission to the Ontario Energy Board available on our website for details regarding supply concerns and issues.)

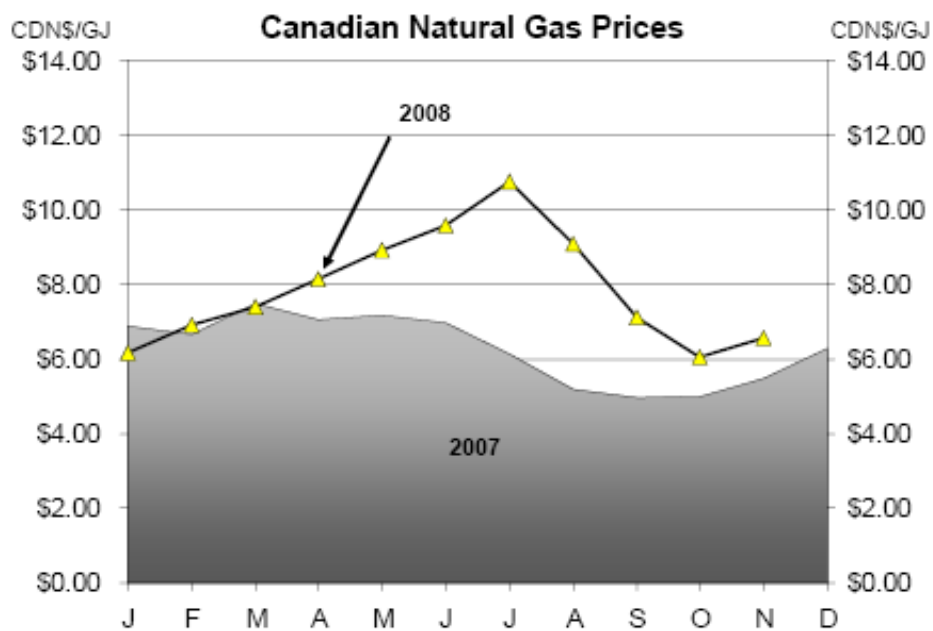
The following charts, from the Canadian Natural Gas Monthly Market Update, November, 2008 (Natural Resources Canada) show the cost increases for natural gas over the past year as well as the continuing decline in production, although drilling increased 7% in 2008. Natural Gas storage is down 3% from last year.

Natural Gas Market Fundamental	Percentage Change	
	Year-to-Year	Month-to-Month
Prices	20%	8%
Heating Degree Days	2%	255%
Production	-8%	-4%
Sales	-4%	15%
Exports	-11%	-4%
Imports	-16%	-4%
Storage	-3%	4%
Drilling	7%	2%

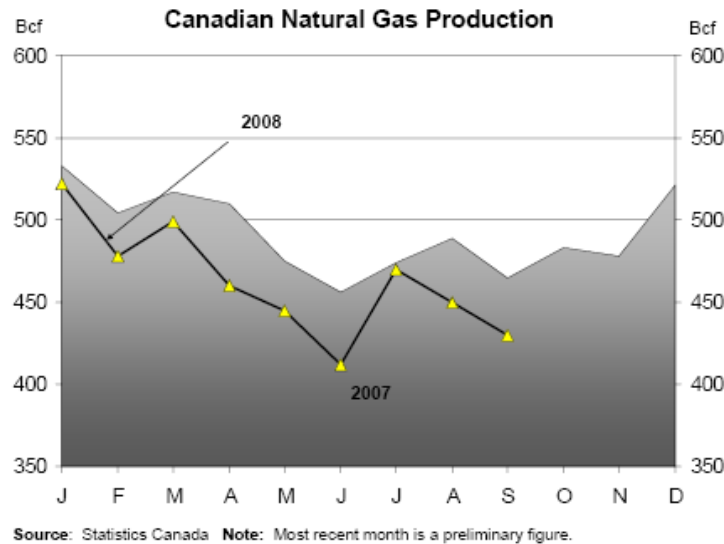
PRICES: CDN \$6.56/GJ in November 2008; an increase of 20%

HDDs: 103 in September 2008; an increase of 2%

PRODUCTION: 430 Bcf in September 2008; a decrease of 8%.



Source: GLJ Energy Publications **Note:** Canadian price is the Alberta price at the AECO hub.



5. The OPA acknowledges that Nanticoke Generating Station is “an important component of the present supply mix ... supporting the security of the electricity system and in helping to manage uncertainties caused by the unavailability and/or reduced capacity of other generating plants. ... Coal-fired generation is a flexible, dispatchable and quick response supply resource, and supports the reliability of the Ontario electricity system. Flexibility is particularly important to respond to commonly occurring supply unavailability and hour-to-hour load following (ramping) requirements. ... also helps to maintain supply reliability to local areas.”

It is equally acknowledged that gas-fired facilities do not perform these functions as efficiently as coal-fired units.

6. Replacing Nanticoke Generating Station with gas-fired generation will have marginal environmental improvement.

◆ Government studies conclude that closing Ontario's coal-fired power plants would make "small" improvement to Ontario's air quality, almost no difference. (Pain Without Gain, Fraser Institute, 2005; Ontario’s Cost-Benefit Analysis - April, 2005)

◆ “... if currently existing remediation technology were used, the air quality effects from coal fired power plants are comparable to those from natural gas plants and neither could be distinguished from the regional background at distances more than a few km from the source.”
 (“A Regional Modeling Study of the Effects on Air Quality of Electric Power Generation by Fossil Fuels” Waterloo Centre for Atmospheric Sciences, May 26, 2006)

SUMMARY

The Proponent has stated "... project advantages clearly outweigh the project disadvantages. Some of the project advantages identified include: contributions to local economy; stable supply of clean and efficient electricity; municipal tax revenues; and, economic spin-offs."

It is clear however, from the information provided above, that this project will impair the local economy and reduce municipal tax revenues in that it will hasten the closure of Nanticoke GS. There are serious concerns regarding the future stable supply of efficient electricity from natural gas-fired generation in this Province.

Recommendations to Dismiss the Request for Official Plan and By-Law Amendments

1. Ministry of the Environment Requirements for Electricity Projects

According to the Guide to Environmental Assessment Requirements for Electricity Projects, "Environment means: ...social, economic and cultural conditions that influence the life of man or a community" and "Negative environmental effects include the negative effects that a project has, or could potentially have, directly or indirectly on the environment at any stage in the project life cycle. ... Negative environmental effects may also include the displacement, impairment, conflict or interference with existing land uses, approved land use plans, business or economic enterprises, ... social conditions or economic structure." And elsewhere, "... neighbourhood or community character, local businesses, institutions, increases in the demands on community services and infrastructure, negative effects on the economic base of a municipality or community, negative effects on local employment".

The proposed project will have a net detriment on the economic structure of Haldimand County, will negatively impact local business, institutions and as a result will increase the draw on community services and infrastructure. Studies have confirmed that evaluation.

2. Provincial Policy Statement

The proposal is not consistent with the Provincial Policy Statement (PPS), the Provincial Growth Plan and is in conflict with matters of Provincial interest. (Re: pages 22-37 of County Report 78-2008)

The Council must consider three elements reiterated throughout the Official Plans, the Provincial Policy Statement, and the Planning Act – (1) social; (2) economic and (3) environmental.

◆ As noted in the preamble to the Provincial Policy Statement, this Statement “provides policy direction on matters of provincial interest related to land use planning and development, and sets the policy foundation for regulating the development and use of land. It also supports the provincial goal to enhance the quality of life for the citizens of Ontario.”

The basis for the vision of Ontario’s Land Use Planning System is the acknowledgment that “the long-term prosperity and social well-being of Ontarians depends on maintaining strong communities, a clean and healthy environment and a strong economy.” The policies are designed to work to fulfill that vision, in conjunction with municipal Official Plans. The policies support “commitment to building livable and healthy communities that provide a higher quality of life for all Ontarians.”

For the reasons stated above, the "Long Term Economic Prosperity" envisioned in the PPS is best served by retention of Nanticoke Generating Station and the rejection of the proposed natural gas-fired project.

◆ The Report 78-2008 recommends the proposed zoning and plan changes because "... the proposal contributes to improved air quality as it would result in energy production which is significantly cleaner than traditional modes of production (i.e. coal). (Page 22).

However, a study conducted by the University of Waterloo's Department of Chemistry compared the effects on air quality of coal and natural gas electricity generation. This study, funded in part by the Ontario Ministry of the Environment, reports that the 4 operating coal plants in Ontario contribute 3-4% of the total SO₂ and about 1-2% of the NO_x in southern Ontario, 10% and 8% respectively within 20 km of the largest facility. However, "currently existing remediation technology on the coal plant reduces both the SO₂ and NO_x contributions to about 0.3% when averaged across southern Ontario and about 1% within 20 km of the largest plant (Nanticoke)". ("A Regional Modeling Study of the Effects on Air Quality of Electric Power Generation by Fossil Fuels" Waterloo Centre for Atmospheric Sciences, May 26, 2006)

The implementation of environmental controls at Nanticoke GS would provide employment for local tradespersons; would reduce emissions to near comparable with natural gas. Further, the use of biomass at Nanticoke GS would enhance both the agricultural and forestry industries in the province and the County. This would fulfill the "Energy and Air Quality" criteria of the PPS.

◆ The Report 78-2008 states that "The subject proposal aims to address this policy by contributing to a sustainable and stable-priced energy supply through the development of an alternative energy system." (Page 22) As shown in our information, the use of natural gas for electricity will not contribute to either a sustainable or a stable priced energy supply. The OPA notes that a major concern with natural gas is the volatility of pricing. Fuel costs represent 90% of the operating costs of natural gas-fired generation.

◆ According to the Provincial Policy Statement, "Planning authorities shall protect, improve or restore the quality and quantity of water by: 2.2.1 (f) promoting efficient and sustainable use of water resources, including practices for water conservation..."

Natural gas-fired generating plants consume large volumes of water, 85 – 90% of volume taken in. Only 10-15 % is returned to the source. Information obtained from the Ministry of Natural Resources staff indicates concerns over proper monitoring of water withdrawals from the Great Lakes Basin. Efforts are being made to determine accurate amounts taken from the Basin from all sources. Further, there are concerns regarding consumptive use and cumulative impact. Allowing industries to withdraw from existing sources, whether it is the municipality or another industry, is not an acceptable practice and hinders the MNR and Government of Ontario attempts to track and monitor withdrawals from the Great Lakes Basin. "Negative impacts" as it refers to water resources, is defined in this Policy Statement as "degradation to the quality and quantity of water..."

3. The Growth Plan for the Greater Golden Horseshoe

◆ For reasons stated above, we maintain that allowing the development of this proposed natural gas-fired power plant is in opposition to the vision for building stronger, more prosperous communities outlined in The Growth Plan for the Greater Golden Horseshoe. Development of the subject lands would **not** address those policies. It would hinder economic development and competitiveness (i.e. create new jobs) and will not diversify the economic base. It will not assist in taking into account the needs of existing and future businesses by providing increased electrical power generation, as it is only meant as replacement for, not in addition to Nanticoke GS. (Page 23 Report 78-2008)

◆ The rationale stated on Page 23, Report 78-2008, regarding Section 2.2.2.1 subsection (i) represents the Proponent's perspective which seeks to minimize the Proponent's costs and ease the

work associated with this project. According to the Ontario Power Authority, new gas-fired facilities should be located close to load centers requiring the additional generation, i.e. the GTA and the Kitchener-Waterloo area.

4. Region of Haldimand-Norfolk Official Plan

◆ The inclusion of Section J – Mineral Resources (Page 25, Report 78-2008) is a misapplication of the section, and a stretch at best to demonstrate compliance with the Haldimand-Norfolk Official Plan. In fact, the Provincial Policy Statement indicates that "“Minerals and petroleum resources shall be protected for long term use. “Petroleum resources are defined in this Policy Statement and “means oil, gas ...”

◆ Report 78-2008 references "Agriculture Section K – Agricultural Area" of the Haldimand-Norfolk Official Plan which "sets out the policy objectives relating to the use and conservation of the Region's (now County's) agricultural resources. In that regard, there is an expressed intent to preserve agricultural assets, rural lifestyle and to foster a thriving agricultural industry." (Pg 25)

The Ontario Federation of Agriculture, representing Ontario’s second largest industry, warns that “Reliable and reasonably priced power is essential to its sustainability”, without which, “production and processing of food in Ontario would be uncompetitive and likely extinct.”

Switching to natural gas fired generation will result in “... increased gas costs for millions of homes and businesses as well as in fertilizer and chemical costs increases for farmers ... increased unemployment, lost investment and lost production ... (OFA) advocates ... cleaner coal, fully scrubbed so that Ontario has power at a cost we can afford with improved air quality.”

The farming community would be better served by implementing biomass at NGS alone or in conjunction with coal.

5. Other

◆ The Ministry of the Environment and the Ministry of Natural Resources have made public statements, legislative decisions and subsequent news releases respecting the concern for the Ontario’s water resources. The cumulative, consumptive use of large volumes of waters, as is projected for this proposed facility, is contrary to government (and Ministry) policies.

A natural-gas fired generating plant in Lambton County - 550 MW, less than ½ the size of this proposal - reports typical amount of water intake for the facility (for make-up in the cooling towers and conditioned for process water in the HRSG) will be approximately 9,000 m³/d to a maximum of approximately 19,000 m³/d. (on average 2,300 gallons/min – up to 3,300 gallons/minute) This represents 4,800,000 litres to 17,900,000 litres per day. Only 13-15% of this water will be discharged back to the water source. The remaining make up flow will be evaporated to the atmosphere. The Ministry of Natural Resources has expressed concerns of ongoing large water withdrawals in terms of cumulative effect. The cumulative effect of removing this volume of water, without return to the source, is significant.

“At a maximum evaporative rate of 87%, the maximum consumptive use is approximately 19,000 m³/d.”. If this large volume of water is required for a plant less than ½ of the size of the proposed Haldimand facility, and one that is expected to run for intermediate load, what will be the water requirement for this proposed power plant? Where will the water be accessed from, and how will

that water be transported to the site? Is the County's Industrial Pumping Station (Nanticoke Water Treatment Plant) for the supply of raw and potable water sufficient to handle this volume of water?

According to the Ontario Water Resources Act and the Water Taking and Transfer Regulation, Section 34, anyone taking more than 50,000 litres of water a day must obtain a permit from a Director appointed by the Minister.

- ◆ Natural gas is a non-renewable resource. The use of natural gas for this project may not meet the Environment Assessment requirements for efficiency of use of this type of resource.

- ◆ The County has not considered the chemical feed system that supplies conditioning chemicals to the water cooling system. In natural gas-fired power plants sulphuric acid will be fed into the circulating water system to reduce alkalinity so that scale formation in the piping remains within an acceptable range." What percent of these chemicals are released to the atmosphere in the form of water droplets that form from the condensed cooling tower vapour? What is the impact on adjacent farm land, vegetation, wildlife or their habitat, of these chemicals?

- ◆ Some "substances" (aluminum, phosphates, TSS, iron, zinc, chromium, copper, silver and zinc) already present in Great Lakes. If large volumes of process water are taken from Lake Erie for the facility, with over 85% of that water being evaporated to the atmosphere, what will be the potential impact of these "substances" becoming airborne via the water droplets formed from the cooling tower drift?

- ◆ Effluent (waste water) will contain such metals as phosphorus, aluminum, chromium, copper, iron, lead, zinc, arsenic, and many others, some of which may exceed provincial guidelines.

- ◆ Has the County considered the impact of the number of large cooling towers on the potential for fogging and icing on adjacent roadways?

- ◆ Natural gas facilities use hydrogen for generator cooling. Has the County addressed the safety concerns associated with this volatile substance?

- ◆ Report 78-2008 notes that "The proposal is a private venture with no direct budget implications to the County. Any external improvements to County or other government / private infrastructure (i.e. roads, waterline, gas pipeline) must be paid for by the proponent, if the application is approved. The proposal could result in job creation, tourism generation, economic spin-offs and an increase in tax assessment for the County." (Page 14) It could be argued that the gas pipeline and transmission tie in are "in the public good" and therefore the ratepayers/taxpayers could end up paying some or all of these associated costs. (Of the \$60 million associated with transmission requirements for the natural gas generating plants in Lambton County, only \$6 million was recoverable from the power generators.) The gas pipeline from the Hamilton area will be particularly costly. What assurances and guarantees does the County have that the external improvements will in fact be paid for by the Proponent?

SUMMARY

1. There remains outstanding environmental concerns regarding this project, including the impact of process water on the Provincially Significant Wetland (PSW) known as the Nanticoke Hemlock Slough Forest near the center of the site; air quality impacts raised by the Ministry of the Environment; Long Point Region Conservation Authority's outstanding concerns with the quantity of operational effluent discharge proposed to outlet to Nanticoke Creek. The CAE Alliance believes that it is premature to consider the by-law and official plan amendments until such time as all of these issues are addressed in the Environmental Assessment process.

2. The Proponent has satisfied the barest minimum requirements in terms of public input. Two Open Houses were advertised in small circulation local papers which would not have captured the notice of most people impacted by this proposal. The Open Houses were conducted with sparse attendance. The public input that was generated focused primarily on the local economy and employment. The CAE Alliance believes that there is overwhelming support in the communities of both Haldimand and Norfolk for the retention of Nanticoke Generating Station, with the implementation of best available emissions reduction technology. The proposed facility is not intended to augment Nanticoke GS, but to replace it. This will, as we have demonstrated, severely impact your communities and the wider provincial area through higher electricity costs.

3. Finally, from the Provincial Policy Statement, which is to guide all planning procedures in Ontario:

"Strong communities, a clean and healthy environment and a strong economy are inextricably linked. Long term prosperity, environmental health and social well-being should take precedence over short-term considerations.

"The Provincial Policy Statement is more than a set of individual policies. It is intended to be read in its entirety and the relevant policies are to be applied to each situation. A decision-maker should read all of the relevant policies as if they are specifically cross-referenced with each other." (Part III – How to Read the Provincial Policy Statement)

Implied in the Policy Statement is the concept of "supporting our collective well-being, now and in the future." Municipalities seek to serve the needs of their distinct regional communities, but not in isolation of the good of the Province.

This is reflected in the Planning Act, Part 1 Provincial Administration, Provincial Interest 2. which states, "... the council of a municipality, a local board, a planning board ... in carrying out their responsibilities under this Act, shall have regard to,

- (a) the protection of ecological systems ...
- (c) the conservation and management of natural resources and the mineral resource base; ...
- (e) the supply, efficient use and conservation of energy and water; ...
- (l) the protection of the financial and economic well-being of the Province and its municipalities; ...
- (o) the protection of public health and safety;
- (p) the appropriate location of growth and development.

Therefore, as Council reviews the natural, social, cultural and economic environment when making this decision, CAE Alliance appeals to the Council of Haldimand to reject the request for the amendments to the existing Official Plan and By-Laws.