

# SR and DS Smith

70, 70A and 70B Lisle Farm Drive,  
Pukekohe

Proposed Private Plan Change Request From Future  
Urban Zone to Mixed Housing Urban Zone

Section 32 RMA Evaluation



Project No. 4345.01

Date 22 January 2024



## TABLE OF CONTENTS

	Page
<b>1 INTRODUCTION</b>	<b>1</b>
<b>1.1 PPC Details</b>	<b>1</b>
<b>1.2 Structure</b>	<b>2</b>
<b>1.3 Section 32</b>	<b>2</b>
<b>2 SECTION 32(1)(A) ASSESSMENT</b>	<b>4</b>
<b>2.1 The Objectives of the Plan Change</b>	<b>4</b>
<b>2.2 Consideration of Alternatives</b>	<b>4</b>
2.2.1 Option1 – Status Quo	4
2.2.2 Option 2 – Business Light Industry Zone	5
2.2.3 Option 3 – Business – Mixed Use Zone	7
2.2.4 Option 4 – Business – General Business Zone	Error! Bookmark not defined.
2.2.5 Conclusion	7
<b>2.3 Efficiency and Effectiveness of the Provisions</b>	<b>7</b>
2.3.1 Utilising an Existing Zone Framework	7
2.3.2 Consideration of all Relevant Environmental Effects	8
2.3.3 Consistency With Other land Nearby	8
2.3.4 Employment to Support Planned Growth in Pukekohe	9
2.3.5 Cost Benefit Analysis	9
<b>2.4 Risk of Not Acting</b>	<b>10</b>

## FIGURES

Figure 1: Locality Plan

## ISSUE AND REVISION RECORD

Status Draft  
Revision No. 1  
Project No. 4314.01  
Date of Issue January 2024  
File Name S32 Evaluation



Prepared by



Robert Scott (BA, BPlan, Dip Bus Admin MNZPI)  
Planning Consultant | Director

Reviewed by



Andrew Wilkinson (BPlan Hons MNZPI)  
Planning Consultant | Director

Approved by



Robert Scott (BA, BPlan, Dip Bus Admin MNZPI)  
Planning Consultant | Director

## LIMITATIONS

This section 32 evaluation report has been prepared for the private plan change Request at 70, 70A and 70B Lisle Farm Drive, Pukekohe, in accordance with the requirements of the Resource Management Act 1991. No responsibility is accepted by Scott Wilkinson Planning Limited or its directors or employees for the use of any part of this report in any other context or for any other purpose.

This report is for use by SR and DS Smith and the Auckland Council only, and should not be used or relied upon by any other person or for any other project.

## 1 INTRODUCTION

### 1.1 REQUEST DETAILS

Site Address	70, 70A and 70B Lisle Farm Drive, Pukekohe
Name of Requester	SR and DS Smith
Legal Description	70 Lisle Farm Drive - Lot 1 DP 169148 70A Lisle Farm Drive - Lot 1 DP 143272 70B Lisle Farm Drive - Lot 2 DP 143272 refer ( <b>Attachment 1</b> )
Site Area	70 Lisle Farm Drive – 5387m <sup>2</sup> 70A Lisle Farm Drive – 10.13 ha 70B Lisle Farm Drive - 8.517 ha
Total Site Area:	19.1857 ha

### PLANNING INSTRUMENTS

#### Auckland Unitary Plan- Operative in Part:

Zoning	Future Urban Zone ( <b>FUZ</b> )
Precinct	NA
Overlays	<u>Natural Heritage</u> NA <u>Natural Resources</u> Natural Resources: High-Use Aquifer Management Areas Overlay [rp] - Pukekohe Kaawa Aquifer Natural Resources: High-Use Aquifer Management Areas Overlay [rp] - Pukekohe Central Volcanic Natural Resources: Quality-Sensitive Aquifer Management Areas Overlay [rp] - Franklin Volcanic Aquifer
Controls	Macroinvertebrate Community Index - Rural
Designations	NA
Other features adjacent	Natural Heritage: Outstanding Natural Features Overlay [rcp/dp] - ID 169, Pukekohe East tuff ring

## 1.2 STRUCTURE

This report is structured to respond directly to the requirements of s32 of the Resource Management Act 1991 (**RMA**) and contains the following Sections:

- **Section 1** provides an overview of the objectives of the private plan change request (**Request**) and assesses the appropriateness of the proposal to achieve the purpose of the RMA. The section concludes that the objectives of the proposed plan change are the most appropriate way to achieve the purpose of the RMA.
- **Section 2** provides an assessment of the appropriateness of the provisions to achieve the objectives of the proposal. This section includes a consideration of reasonably alternative methods to achieve the plan change objective and assesses the costs, benefits, efficiency and effectiveness of the provisions. The section concludes that the provisions of the proposed plan change are the most appropriate way of achieving its objectives.

This s32 evaluation should be read in conjunction with the Assessment of Environmental Effects report and suite of technical reports that were prepared in support of the proposal and provide further details of the proposed plan change and its potential effects.

## 1.3 SECTION 32

The provisions of section 32 of the RMA are as follows.

*32 Requirements for preparing and publishing evaluation reports*

*(1) An evaluation report required under this Act must—*

- (a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and*
- (b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—*
  - (i) identifying other reasonably practicable options for achieving the objectives; and*
  - (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
  - (iii) summarising the reasons for deciding on the provisions; and*
- (c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.*

*(2) An assessment under subsection (1)(b)(ii) must—*

- (a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—*
  - (i) economic growth that are anticipated to be provided or reduced; and*
  - (ii) employment that are anticipated to be provided or reduced; and*

- (b) *if practicable, quantify the benefits and costs referred to in paragraph (a); and*
  - (c) *assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.*
- (3) *If the proposal (an amending proposal) will amend a standard, statement, national planning standard, regulation, plan, or change that is already proposed or that already exists (an existing proposal), the examination under subsection (1)(b) must relate to—*
  - (a) *the provisions and objectives of the amending proposal; and*
  - (b) *the objectives of the existing proposal to the extent that those objectives—*
    - (i) *are relevant to the objectives of the amending proposal; and*
    - (ii) *would remain if the amending proposal were to take effect.*
- (4) *If the proposal will impose a greater or lesser prohibition or restriction on an activity to which a national environmental standard applies than the existing prohibitions or restrictions in that standard, the evaluation report must examine whether the prohibition or restriction is justified in the circumstances of each region or district in which the prohibition or restriction would have effect.*
- (4A) *If the proposal is a proposed policy statement, plan, or change prepared in accordance with any of the processes provided for in Schedule 1, the evaluation report must—*
  - (a) *summarise all advice concerning the proposal received from iwi authorities under the relevant provisions of Schedule 1; and*
  - (b) *summarise the response to the advice, including any provisions of the proposal that are intended to give effect to the advice.*
- (5) *The person who must have particular regard to the evaluation report must make the report available for public inspection—*
  - (a) *as soon as practicable after the proposal is made (in the case of a standard, regulation, national policy statement, or New Zealand coastal policy statement); or*
  - (b) *at the same time as the proposal is notified.*
- (6) *In this section,—*
  - objectives** means,—
    - (a) *for a proposal that contains or states objectives, those objectives:*
    - (b) *for all other proposals, the purpose of the proposal proposal means a proposed standard, statement, national planning standard, regulation, plan, or change for which an evaluation report must be prepared under this Act*
  - provisions** means,—
    - (a) *for a proposed plan or change, the policies, rules, or other methods that implement, or give effect to, the objectives of the proposed plan or change:*



- (b) for all other proposals, the policies or provisions of the proposal that implement, or give effect to, the objectives of the proposal.

## 2 SECTION 32(1)(A) ASSESSMENT

Section 32(1)(a) of the RMA requires the evaluation of the extent to which the objectives of the PPC being evaluated are the most appropriate way to achieve the purpose of the RMA. The purpose of the RMA is to promote the sustainable management of natural and physical resources, recognise and provide for matters of national importance and have particular regard to specified matters. For the following reasons it is considered that the plan change objectives are the most appropriate way to achieve the purpose of the RMA.

### 2.1 THE OBJECTIVES OF THE PLAN CHANGE

A key issue identified in the Auckland Unitary Plan – Operative in Part (**Unitary Plan**) (Issue B2.1) is the continued pressure to accommodate Auckland's population growth and provide access to housing and employment opportunities. This Request responds to that issue with regard to providing further opportunity to establish residential development in an area identified for residential growth and adjoining existing residential areas to the west and south.

While this Request is exclusively for residential development it provides for additional residential growth to support employment growth already underway in Pukekohe.

The Pukekohe-Paerata Structure Plan (**Structure Plan**) has the broad goal of:

*New growth areas will enhance Pukekohe as a focal point and place to further support the surrounding rural economy. These areas will offer a range of housing choice and employment opportunities for people at all stages of life. It will be well connected to the wider Auckland and Waikato regions, while protecting and enhancing the natural, physical and cultural values that contribute to Pukekohe's unique character and identity.*

Pukekohe is recognised as one of two satellite towns in the Auckland region (the other being Warkworth). As a satellite town, it is identified as being a priority for urban growth and has the objective to be a self-sustaining urban community outside of metropolitan Auckland.

### 2.2 CONSIDERATION OF ALTERNATIVES

#### 2.2.1 OPTION1 – STATUS QUO

Maintaining the status quo would see the land remaining as FUZ. This is not seen as the best option as residential and business/employment development and intensification is proceeding in Pukekohe with new areas of residential development and population growth occurring at present. It is understood that several other private plan changes in Pukekohe have been approved (i.e. Plan Change 74 – Golding Meadows) that include significant new areas of business and employment zoning which need a growing residential population base to support them.

The PCA also adjoins existing and new residential development to the west and south with large lot residential development (albeit under a FUZ zoning) to the north. The PCA will also be further enclosed by the proposed Pukekohe North East Arterial road which essentially runs across the eastern part of the PCA.

For these reasons, maintaining the status quo of FUZ on the land is not considered the best option.

## 2.2.2 OPTION 2 – ZONE THE LAND SINGLE HOUSE ZONE (LOW INTENSITY ZONE PC78)

The Pukekohe Paerata Structure Plan (**Structure Plan**) identified the PCA as being suitable for a Residential - Single House (**SH**) zone in recognition of ecological and topographical constraints on the land. The Structure Plan identifies this area as D1 -Pukekohe North East and describes it as follows:

*These areas are generally steeply undulating pastoral land and several ridgelines run through them. The northern edge of the Pukekohe East Explosion Crater runs along the southern boundary of Area D2. This explosion crater is scheduled as an Outstanding Natural Feature in the Auckland Unitary Plan. A ridgeline also runs along the southern boundary of this area. From a geotechnical perspective these areas have constraints that give them a high development premium<sup>28</sup>. A previous landfill has been identified in the southern part of Area D1 (east).*

*The areas contain several significant ecological areas scheduled in the Auckland Unitary Plan. There are also several areas of unscheduled indigenous vegetation identified. From a landscape perspective these areas are identified as having very high sensitivity to modification.*

The recommended zoning for this section of the Structure Plan is:

*These areas are proposed to be zoned Residential – Single House to reflect their peripheral location, topography and environmental characteristics. Furthermore, this area adjoins the Runciman Precinct to the north. This precinct recognises landform, landscape, vegetation and riparian corridor features that warrant protection and enhancement.*

The zone purpose is set out in H3.1 of the Unitary Plan as follows:

*The purpose of the Residential – Single House Zone is to maintain and enhance the amenity values of established residential neighbourhoods in number of locations. The particular amenity values of a neighbourhood may be based on special character informed by the past, spacious sites with some large trees, a coastal setting or other factors such as established neighbourhood character. To provide choice for future residents, Residential – Single House Zone zoning may also be applied in greenfield developments.*

*To support the purpose of the zone, multi-unit development is not anticipated, with additional housing limited to the conversion of an existing dwelling into two dwellings and minor dwelling units. The zone is generally characterised by one to two storey high buildings consistent with a suburban built character.*

While the planning rationale for zoning the land SH Zone, is understood and is an understandable response to the constraints listed above, it is noted that the Structure Plan was released in August 2019 at a time where the emphasis on intensification and housing affordability was not as acute as they are now. The Structure Plan also pre dates the release of the most recent version of the NPS:UD which places a significantly higher emphasis on the need to build to higher intensities to make infrastructure more efficient, housing more affordable and to reduce the loss of highly productive land.

As a result of the latest integration NPS:UD the Council has released PC78 which responds to the NPS:UD and requirements of the Resource Management Act to:

- enable development in and around neighbourhood, local and town centres;



- incorporate Medium Density Residential Standards that enable three storey housing in relevant residential zones in urban Auckland;
- implement qualifying matters to reduce the height and density of development required by the RMA to the extent necessary to accommodate a feature or value that means full intensification is not appropriate.

With regard to Pukekohe, the response of the Council in PC78 is to include all of Pukekohe into the plan change and rezone the Residential – Mixed Housing Suburban (**MHS**) Zone land adjoining to the west and south to MHU Zone. PC78 proposes to dispense with the SH Zone and MHS Zone and have three residential zones:

- Low Intensity Zone (**LI**) Zone
- MHU Zone
- Terrace Housing and Apartment Zone (**THAB**)

The purpose of the LI Zone in section H3A.1 of PC 78 is as follows:

*In the urban environment, the Residential – Low Density Residential Zone is applied to identified sites within residential neighbourhoods, subject to relevant qualifying matters, with the purpose being to:*

- *incorporate MDRS, and make development less enabling to the extent necessary to accommodate the qualifying matter(s) that are present;*
- *protect significant ecological areas and outstanding natural features and landscapes and high natural landscapes;*
- *protect areas of distinct cultural, historic and natural heritage;*
- *protect areas subject to risks from natural hazards including coastal hazards, coastal erosion, overland flow paths and flood plains;*
- *maintain and enhance special character residential areas; and*
- *provide for low density residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses.*

*It is applied in the urban environment where the relevant qualifying matters have resulted in a lower intensity of development. Limiting levels of re-development is necessary to accommodate one or more qualifying matters while enabling residential development. The zone applies to:*

- *the Waitakere Ranges Heritage Area;*
- *neighbourhoods with special character based on past development patterns;*
- *a coastal setting;*
- *sites containing cultural values or substantial proportions of significant ecological areas;*
- *sites that are subject to high natural character, outstanding natural features or landscapes; or,*
- *other factors such as natural hazards risks in the coastal environment and from flooding.*

In this case, while the PCA has area of high ecological value, these areas are not readily able to be

developed and their protection would likely occur under any residential zoning under PC78. The Request has demonstrated that ecological areas can be protected and enhanced under the higher intensity zoning. It is noted that the PCA does not contain any ONL's or ONF's or any significant cultural sites or heritage areas. The PCA is also not subject to any natural hazards (i.e flooding). On that basis, there are no compelling Qualifying Matter under the NPS:UD that could be relied on to justify a LI Zone in this location under PC78.

### **2.2.3 OPTION 3 – ZONE THE LAND RESIDENTIAL – MIXED HOUSING SUBURBAN**

The MHU Zone is the preferred zoning option for this Request. The MHU Zone is consistent with the expectation of the NPS:UD in that it provides for greater intensity at an identified residential scale (three storeys) and it allows for a wide range of housing typologies to meet the demands of the local residential market.

The concept subdivision has demonstrated that while there are some steep gully areas on the PCA, there are also large areas of north and east facing land on ridgelines and spurs that can be developed at higher intensities. This can, in turn, off-set the loss land that are too steep to develop or have ecological values worthy of protection and enhancement. While the concept plan shows a relatively conservative lower density development option, the roading and lot/block layout is easily adaptable for higher intensities should the demand for that be realised.

The higher intensity of the MHU Zone is also compatible with the proposed Pukekohe North East Arterial road which can service subdivision and development once established.

For these reasons a MHU Zone is considered to be the best option.

### **2.2.4 CONCLUSION**

Overall, the MHU Zone is considered to be the best option for rezoning the land and is preferred to the maintaining the current FUZ zoning. It is able to be applied to the land without amendment to the zone provisions and will supported by a bespoke precinct with appropriate provisions applying to the PCA.

## **2.3 EFFICIENCY AND EFFECTIVENESS OF THE PROVISIONS**

### **2.3.1 UTILISING AN EXISTING ZONE FRAMEWORK**

The Request will see the underlying zoning of the land change from FUZ to MHU Zone. The MHU Zone was established through the development of the Unitary Plan which became operative in Part in November 2016 and applies to a wide range of established residential areas generally close to existing or proposed town centres. It is also the preferred residential zoning under PC78.

The provisions of the MHU Zone were assessed and considered as part of the Unitary Plan process and determined to provide the most efficient and effective method for facilitating reasonably high intensity residential development up to three storeys in height across Auckland, while also supporting lower more traditional intensities where market or on-site physical limitations exist. The MHU Zone is considered the most appropriate residential zone available within the suite of the residential zones to meet the broader objectives of the plan change for the following reasons:

- There is a demonstrated demand for new greenfield land on larger sites to establish residential development and within the wider area.
- The Pukekohe-Paerata Structure Plan identifies the land for residential development and represents a logical extension of existing residential development to the west while also being within the de facto urban fence created by the proposed Pukekohe North East Arterial road.

- The land meets infrastructure pre-requisites and will be infrastructure ready by 2025 in terms of wastewater and water supply.
- The request can connect to existing roading infrastructure and provide adequate walking and cycling access;
- The Request will allow a range of housing typologies and a range of intensities to suit the needs of the Pukekohe community and the physical constraints of the PCA.

It is concluded that the provisions of the MHU Zone provide an appropriate suite of objectives, policies, development standards and activity controls to enable the establishment of a quality residential neighbourhood within Pukekohe.

### 2.3.2 CONSIDERATION OF ALL RELEVANT ENVIRONMENTAL EFFECTS

Through substantial technical investigations and design considerations it has been determined that the land subject to this Request can be developed for residential activity at a medium to medium-high intensity. In particular, the land has significant ecological values in the form of native vegetation and natural water courses and wetlands that can be protected and enhanced. These protected features will also provide a high degree of amenity within the residential neighbourhood and has the potential to be a public reserve.

It has been demonstrated that the geology and geotechnical limitations of the land are sufficient to allow residential development in accordance with the activities and intensities enabled in the MHU Zone. Similarly, only low levels of contamination have been identified and can easily be managed as part of any development process. On that basis there are no physical constraints or adverse environment effects that cannot be avoided remedied or mitigated.

In terms of transportation effects these have been assessed and it has been demonstrated that the road network can support a MHU Zone in this locality. A number of transportation linkages have been identified to facilitate access to the PCA and the entire PCA can be serviced through local roading infrastructure. The Request includes the potential connection to the Pukekohe North East Arterial road once it is formed.

In terms of infrastructure effects, the land can be adequately serviced by reticulated water supply and planned wastewater infrastructure. With regard to stormwater the assessment has demonstrated that on site treatment, retention and detention can be undertaken to support residential development.

Finally, cultural effects have been assessed and the Requester has engaged with local mana whenua groups and there has been Responses from Ngati Tamaoho and Ngati Te Ata. The proposed precinct has recognised these values in its description, objectives and policies.

Overall, it is therefore concluded that all relevant environmental effects have been considered and that these can be sufficiently avoided, remedied or mitigated under the development that would be enabled in the MHU Zone.

### 2.3.3 CONSISTENCY WITH OTHER LAND NEARBY

It is concluded that the MHU Zone would be an effective zoning with regard to the zoning and established activities on other land nearby. The proposed MHU Zone will complement other residential zoned land to the west and south and have been rezoned to MHU Zone under PC78. In this regard the Request represents a logical extension of existing residential land to support other similarly zoned land. The proposed zoning will also be located westward of the Pukekohe North East Arterial Road which effectively forms a new urban boundary for Pukekohe.

### 2.3.4 REZONING TO SUPPORT PLANNED GROWTH IN PUKEKOHE

The purpose of the Request to rezone the land to MHU Zone is to provide a range of residential housing options and intensities to support the planned and already established residential growth in Pukekohe. The MHU Zone provides for a flexible and broad range of residential activities in the range of residential zones in the Unitary Plan while also being easily adapted to incorporate the Proposed zoning under PC78 and the introduction of MDRS standards.

There is demonstrated demand for more residential land in Pukekohe and the provision of additional residential land to support growth is an outcome of the Pukekohe-Paerata Structure Plan and the Auckland Plan 2020.

While the sequencing of rezoning of the FUZ in this locality outside the timeframes indicated by the FDS, the land is infrastructure ready and a logical extension of existing residential land in Pukekohe East.

### 2.3.5 COST BENEFIT ANALYSIS

This section provides an assessment of the potential costs and benefits of the plan change as a result of its likely environmental, economic, social and cultural effects and as is required under sections 32(2)(a) and (b) of the RMA. This section should be read in conjunction with the more detailed Economic Assessment prepared by Urban Economics that is submitted in support of this plan change.

BENEFITS		COSTS	
<b>Environmental</b>			
<p>There are significant ecological values associated with the land subject to the Request and these are to be protected and enhanced as part of the Request.</p> <p>The protected and enhanced ecological will improve the amenity values and can has the potential for public access and acquisition as a public reserve.</p> <p>Stormwater mitigation can be achieved using a range of low-impact design techniques and methods.</p> <p><b>Benefits associated with retiring the land from agricultural land use, including reduced nutrient loading into receiving waterways and groundwater (through a reduction in fertiliser use) and reduced soil erosion (that would be associated with horticultural or agricultural activities).</b></p> <p>Introduction of stormwater treatment to improve the quality of water entering receiving waterways and the coastal / marine environment.</p>		<p>There is some identified low-level contamination but this can be managed using accepted remediation methods.</p> <p>Enabling new impervious surfaces that will both increase the volume of stormwater being generated as well as the level of contaminants within the stormwater (associated with roads, driveways and parking areas). This has the potential to enter the receiving waterways if not managed appropriately, which could then cause increased stream erosion and a reduction in water quality.</p> <p>Soil erosion associated with land modification required to develop the site for residential use.</p> <p>Adverse effects on the local transportation network from traffic arising during the construction period and from the resulting dwellings.</p> <p>The Request will result in the loss of productive soils, although it is noted that the site has been identified by Council as being suitable for urban development through the operative FUZ zoning.</p>	
<b>Social and Cultural</b>			

<p>The Request will provide opportunity for additional residential development for the growing residential population. Positive outcomes associated with this include less trips to Pukekohe for workers and greater social and community cohesion associated with people living and working locally.</p> <p>Adverse Māori cultural effects can be managed in association with mana whenua and their values have been recognised in the precinct provisions.</p> <p>The land is located in an area that is not identified as having high cultural or heritage values.</p> <p>The potential for walkways alongside and through the ecological areas to be protected and enhanced.</p> <p>Benefits arising from additional job creation and employment opportunities during the construction phase.</p>	<p>The Request will involve the modification of the existing open and rural pastoral land.</p> <p>The visual effects of land modification during the construction effects.</p> <p>The amenity effects of construction activity and associated noise and heavy vehicle movements.</p>
<p><b>Economic</b></p>	
<p>There is demand for new residential land in Pukekohe. The request will immediately address that demand and may assist with housing affordability.</p> <p>The costs of the private plan change process are borne by the Requester.</p> <p>The land is of a sufficient size to accommodate additional residential development without compromising the viability of other residential precincts within the Pukekohe-Paerata area.</p>	<p>The financial cost of the plan change process to enable the proposal.</p> <p>While the three waters infrastructure needed to service the Request are in place or planned to be ready by 2025, there will be ongoing maintenance costs associated with the infrastructure.</p>

## 2.4 RISK OF NOT ACTING

Section 32(2)(c) requires an assessment of the risk of acting or not acting if there is uncertain or insufficient information about the plan change. This plan change request includes technical reports that have been prepared to understand the effects of the plan change. These reports assess matters relating to civil engineering, geotechnical, transportation, ground contamination and economic impacts.

Based on the above, it is concluded that sufficient information has been gathered to justify proceeding with the plan change and that the risk of acting on this information is less than not acting and adopting a reactive stance to unplanned development within FUZ zoned land in the area.

The land is zoned FUZ and is identified suitable through structure planning for a MHU zoning along with other land to the west and south. While the land outside the preferred timeline for urban zoning under the FDS, there is need for new residential land in Pukekohe to be zoned now. This proposal would provide much-needed residential land to meet immediate demand to support growth occurring at the present.