

Proposed Changes Supported by the Advocates for Balanced Growth and Knox County Planning Alliance

We support the [amendments offered by Commissioner Frazier](#) – the ones with “perceived general support”, and we support the version below of amendments that are being discussed.

Key: existing language in black
proposed language in red

1 Changes to the Rural Place Type definitions

Rural Conservation. Update “Housing Mix” to state “Single family residential subdivisions shall be clustered in a pattern that preserves 50 percent or more open space **or environmentally sensitive areas** on a given site”

Why? A proposed action item defines the ‘environmentally sensitive areas’ to include wetlands, surface waters, prime and locally important farmland soil, hillside protection areas, and others. Including ‘or environmentally sensitive areas’ gives weight to preserving those features, and also eliminates a potential adverse impact, where this could be construed to require preservation of true “open space” and not forested areas, hillsides, etc.

Rural Agriculture – update description to read “Typically located in rural areas but smaller lots may be found. **Typically has prime or locally important farmland soils.**”

Why? A defining characteristic of Agricultural lands should be good soil. Prime or locally important farmland soils indicate where we have the highest potential for crop, livestock and forestry production. Those soils are critical resources to conserve, because once graded for development, you can’t replace that soil.

2 Changes to the Appendix H Grid for Related Zonings

Rural Living – change all Planned Residential Zones to “Not Related / Appropriate”.

Why? When you look at the Rural Living Place Type - the descriptions and the pictures - you see pictures of houses on very large lots, or houses associated with farms and barns, or woods. These are houses that have been there for many years, built with an architectural style that fits in with the surroundings. Sometimes there are newer houses interspersed. There is variety in the types and styles of houses, sizes of lots, and their association to the land.

What you don't see in that place type description are pictures of subdivisions. You don't see entire developments where the houses are all built by the same builder using the same building materials throughout the development. This is the type of development we see just about every time a Planned Residential zone is approved in Knox County, and it doesn't fit in the Rural Area.

Rural Conservation – for Planned Residential, change it to text stating “Partially related - up to 1 du/1 acres in Rural Area, up to 3 du/1 acre in PGA”

Why? Rural Conservation is where we expect to see some development, probably in a planned manner. Even subdivisions, or townhomes, or smaller scale apartments. The Place Type requires conservation of at least 50% of the property.

Allowing densities of up to 5 du/ac across the properties would yield built-out densities of at least 10 du/ac in the Planned Growth Area (more if they build on less than 50% of the land), and at least 4 units per acre in the Rural Area. In the Rural Area in particular, residents are expecting it to be limited to 1-2 units per acre in the built out section; they are against tightly ‘clustering’ a large number of dwelling units. So a reduced density is appropriate.

Corridor Mixed Use – recommend a minimum density for Planned Residential zones of **minimum of 5 du/ac**.

Why? Corridor Commercial already sets this floor. The Mixed-Use district is where we want more density – more people to access the services and businesses in walking distance. We want to direct density to this Place Type

Suburban Residential - in the Planned Growth Area, allow up to **5 units** instead of the drafted 12 units.

Why? This matches the existing LDR sector plan designation. In areas where more dense and more variety is desired, the Suburban Residential Place Type is available.

3 Other Actions for Rural Character and Protection

Page 59. **Policy 7. Encourage development practices that conserve and connect natural features and habitat.** Add new action items to support this policy to read:

“Create design standards that encourage connection of natural areas to provide an ecological framework and promote migration for wildlife. Development plan review and approvals should look for opportunities to connect open space and natural habitats across developments and consider threatened and endangered wildlife species and wildlife corridors.”

Why? A common conservation design requirement is to connect open spaces on adjacent developments. Where there are wildlife corridors, we should keep those. Residents enjoy wildlife!

Create design standards for the Rural Place Types that protect and enhance existing rural heritage character defining elements such as fencing, street design, tree canopy, and built forms.

Why? “Rural Character” is potentially subjective. We have seen a lot of “Knox Box” developments pop up in our rural areas. This would put an action item into the UDO team to create these design standard.

An Example of what they might look like in the UDO:

To protect and enhance existing rural heritage character, the following requirements and guidelines shall apply to all new development or redevelopment within Rural placetypes:

- A. Gated subdivisions shall be prohibited within Rural Placetypes, except where those rights have been vested.
- B. Built forms commonly associated with suburban development, such as 'themed' subdivisions, entryway monuments, geometric or layered landscaping forms, or similar design elements shall be prohibited.
- C. Continuous masonry walls shall be prohibited along road frontages.
- D. The existing character of the Rural Area should be preserved and/or enhanced.

Examples of character-defining elements include, but are not limited to:

- 1. Agriculture, croplands, pastures, rural open spaces, thickets of trees and bushes, hedgerows, natural topography, and other natural elements.
- 2. Rural fencing, such as split-rail, paddock, picket, rustic timber, barbed wire, wire meshes or panels, livestock fences, or similar styles and materials.
- 3. Narrow streets, often containing no more than two vehicular lanes, sidewalks when required, and grass shoulders.
- 4. Drainage swales or other open stormwater systems, and the absence of curb-and-gutter systems.

5. Shared use of Right-of-Way by motorists, pedestrians, cyclists, and horses.
6. Single-family residential frontages, often characterized by an organic distribution of homes and auxiliary structures, with large front setbacks, narrow residential driveways, and alternative paving materials.
7. Shade trees, continuous street canopy, and scattered clusters of natural landscaping
8. Historic sites and farm buildings

Page 71. **Plan Management Cycle**

Add bullet point under Ten Years to read:

“Update the Suitability Factors so that all categories of the Environmentally Sensitive Areas are considered.”

Why? The Suitability Analysis did not have these constraints analyzed: agricultural soils, historic resources, and conservation areas (where conservation easements are present). These are used in other planning districts in Tennessee; unsure why these were not included in our Suitability Analysis.

4 Strengthen Criteria to Update Plan (Maintain Plan Integrity)

Page 72.

[Note: this is probably a substantial change and will require reconsideration by Planning Commission. If County Commission passes a Comprehensive Plan in April, recommend making the interim changes, which were considered by Planning Commission:

- Change this to “two” instead of “one” of the proposed criteria
- Vote to send the below criteria back to Planning Commission for consideration, so that the amendment process can begin immediately.

/end note]

Amend **Criteria for a plan update** (blue column) to read:

Criteria for review and approval of plan amendment.

The following review and approval criteria shall be used in reviewing and taking action on all comprehensive plan future land use map amendments, including changing conditions due to existing zoning. The facts supporting a favorable evaluation of each criteria must be documented:

- 1) Whether one of the following situations exists:
 - a) An obvious or significant error or omission in the plan,
 - b) Changes of conditions (such as adjacent Place Types of the Future Land Use Map, uncontrolled natural forces/disasters, etc.). The change of a zoning or land use in the vicinity of a proposed property should be considered a change of condition. This would protect the integrity of the plan and place types.
 - c) Introduction of significant new utilities or state/federal/local road projects that were not anticipated in the Plan and make development more feasible
- 2) Whether the plan amendment request supports the policies, goals, objectives, and criteria of the Plan.
- 3) Whether the plan amendment request is compatible with the surrounding future land uses as identified in the future land use map.
- 4) Whether the plan amendment request can be adequately served by existing transportation facilities and other infrastructure and services such as schools, water and sewer.
- 5) Whether the plan amendment request negatively impacts environmentally sensitive areas identified by Planning.
- 6) Whether the plan amendment request respects clear and sharp distinctions made in the Plan between suburban and rural Place Types and therefore will not lead to urban / suburban sprawl.

Why? We just spent 2 years, over a million dollars, expended thousands of hours of staff, consultant, and community time, and have had over 4,000 public comments to develop our new Comprehensive Land Use Plan. We want that effort to be respected, and not just amended every time an applicant smells a new opportunity.

The first 4 draft criteria from Planning Commission are the same as the current criteria for amending the plan. Under those 4 criteria, we had 151 sector plan amendments in unincorporated Knox County from 2018 through 2023 (5 years) and 77% of those were approved by the Planning Commission. The addition of the 5th one – “proposed changes support the policies, goals, objectives, and criteria of the Plan” – should be a mandatory one for any plan amendment. Thus, we can expect similar ‘flexibility’ with amending the current plan if we use the existing criteria.

Our staff, planning commissioners, county commissioners, and the community are overwhelmed by these constant requests. We need better criteria.

This rewritten proposal of criteria requires a favorable evaluation of each of the criteria to be documented. And to note: #6 This is where we protect the integrity of the Place Types and the intent of plan. Ex. An applicant has land that is Rural Living / Rural Conservation within the Planned Growth Area, like Ruggles Ferry, and wants a higher density, so they request Suburban Residential. If approved, then that approval is used as justification for future approvals and encroachment into the areas designated for rural place types. We don’t want this to become another bad cycle of transitioning development into a rural areas one request at a time.

5 Improve Land Use Decision Predictability

[Note: this is probably a substantial change and will require reconsideration by Planning Commission. If County Commission passes a Comprehensive Plan in April, recommend making the interim changes, which were considered by Planning Commission:

- Add this text after the bullet point for “Not related / appropriate” to provide clarification - The zoning district is not consistent with the Future Land Use Map Place Type

/end Note]

Update Appendix H. **Place Type and Zoning Correspondence Matrix** to state:

Relationship of Future Land Use Place Types to Zoning Classifications

The matrix identifies the relationship between the existing zoning districts and the future land use place types in the Comprehensive Plan. **Four possible relationships between place types and zoning districts exist:**

Directly related. The zoning district is appropriate to implement the place type.

Partially related. The zoning district may be appropriate, but with qualifications (such as a development plan with conditions).

Appropriate zoning district for any place type.

Not related / appropriate. **The zoning district is not consistent with the Future Land Use Map Place Type**

The zoning district and future land use designation for a property shall be compatible with one another. Properties shall only be rezoned to a Zoning District that is directly related or partially related to the future land use designation for that property as shown in Appendix H. Zoning districts depicted as “not related / appropriate” are inconsistent with the Comprehensive Plan.

As part of the anticipated zoning code update, amended or new zoning districts may be proposed to align with the place types.

Review criteria for all zoning map amendment requests.

1. The applicant shall demonstrate that the proposed zoning amendment is consistent with the intent of the place type for the subject site, and reference the following attributes of the Place Type:

- a. Land Use Mix
- b. Housing Mix (if applicable)
- c. Building Form Attributes

d. Transportation Attributes

e. Open Space

2. The appropriateness of the proposed zoning map amendment for a subject location shall be determined based upon compliance with the place type description in addition to:

a. Availability of public facilities and services to the subject site.

b. Impacts on the public welfare of the proposed zoning district.

c. Impacts on environmentally sensitive areas, natural resources and environmental features.

d. Compatibility of the proposed zoning district with surrounding zoning districts and uses adjacent to the subject site.

e. Other requirements as determined by the Zoning Code.

A request may be denied or approved with conditions if the proposed rezoning amendment is deemed inappropriate based upon place type description, other policies in the Comprehensive Plan, or other analysis of the request.

a. For example, conditions could restrict development until the surrounding transportation or utility infrastructure is sufficient to support development of the site under the new zoning.

b. Or conditions could require set-aside of open spaces, provision of amenities (public or private), landscaping, buffers, or designation of areas not to be disturbed or developed.

Review Criteria for Partially Related Districts

If the requested zoning district is “partially related” then at least one of the following criteria must be met. These are in addition to the criteria above. Applicants are required to have a pre-application meeting with staff to ensure one of the following criteria is met:

1. The proposed zoning district is consistent with the secondary uses of the subject site’s place type. If the intent of the request is to create a supportive use described in the place type, then the applicant must explain how the request supports that outcome.
2. The proposed zoning district is compatible with the current zoning of adjacent sites.
3. The proposed zoning district is directly related to a place type that is adjacent to the subject site on the Future Land Use Map.

Why? Today staff uses the Land Use Classification Table as a recommendation, but Planning Commission and County Commission are allowed to consider a wide variety of zonings – essentially, anything. This version of Appendix H eliminates the “game” that is played when an applicant thinks they can get something through the legislative body, even if it goes against the related Plans.

6 FLUM Map Changes - Midway

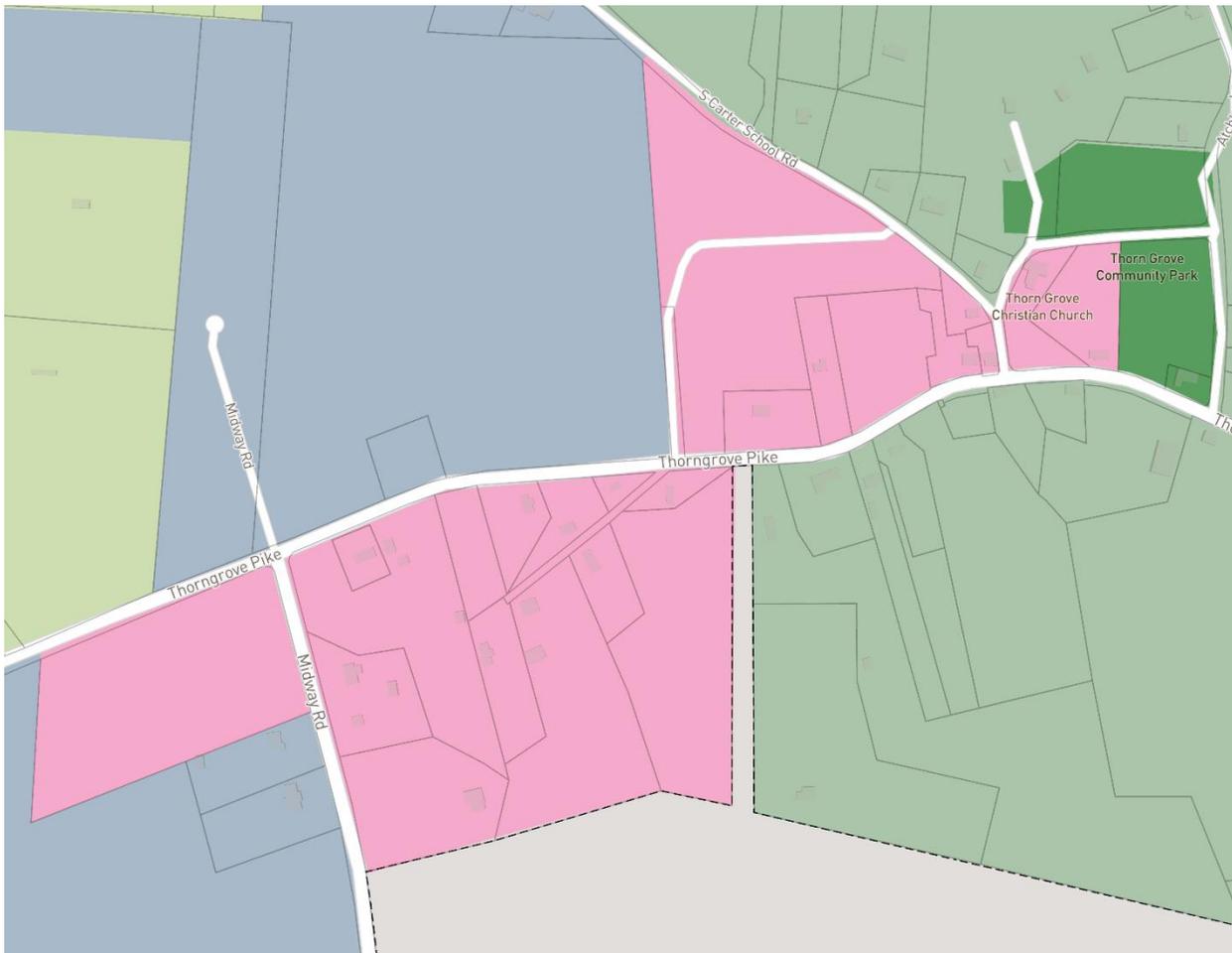
Midway Area – Removing Rural Commercial

In order to reduce commercial pressure on the rural Throngrove Community, the Rural Commercial on the east side of Midway Rd, north of I-40, should change to Rural Living. This does not include the two small parcels 9727 and 9915 Thorn Grove Pike, which have existing commercial uses and would remain Rural Commercial.

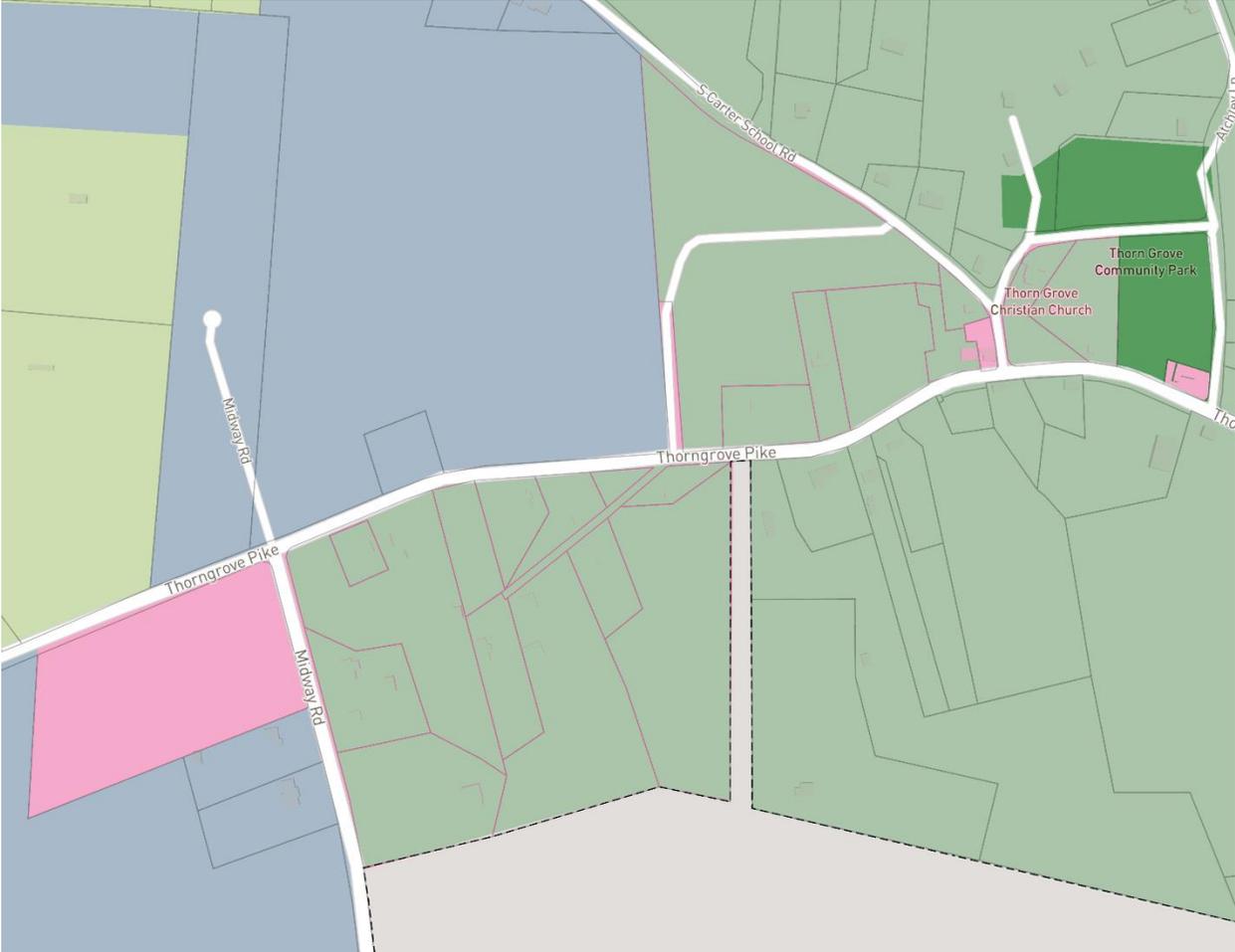
This does not impact the Rural Commercial west of Midway Rd that is owned by the Industrial Development Board, nor does it include the proposed Rural Commercial south of I-40.\

Why? The proposed Rural Commercial east of Midway Rd dates back to the 2011 East County Sector Plan, which was approved before the Midway Business Park was approved and before the 2016 East County Community Plan.

Midway Business Park – Current Draft



Midway Business Park – Proposed Changes



7 FLUM Map Changes – Northeast Knox

Northeast Knox – Coordinating Infrastructure with Growth

To coordinate growth (new development) with infrastructure, the proposal is to adopt an intermediate FLUM map for the county that recategorizes much of this area to the “Rural Living” placetype.

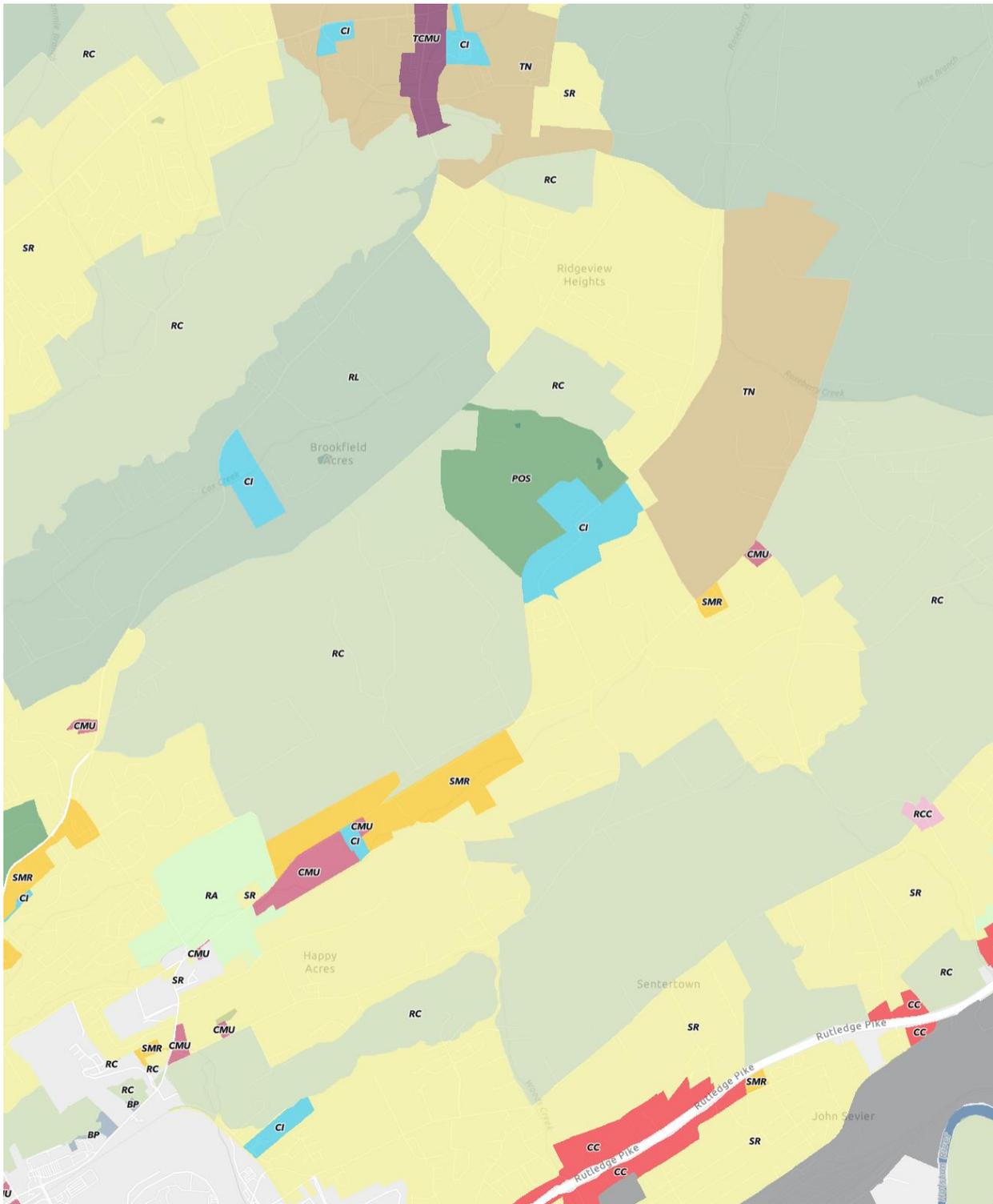
- This provides time to do a small area / mobility study identify an implementation timeline for needed improvements – to coordinate the infrastructure with growth.
- The new UDO should have design standards and updating zoning that will be more compatible with the existing rural character of northeast Knox County

Once the mobility study is complete and the new UDO is adopted, a follow-up would be to update the FLUM for this area based on the new plans for infrastructure.

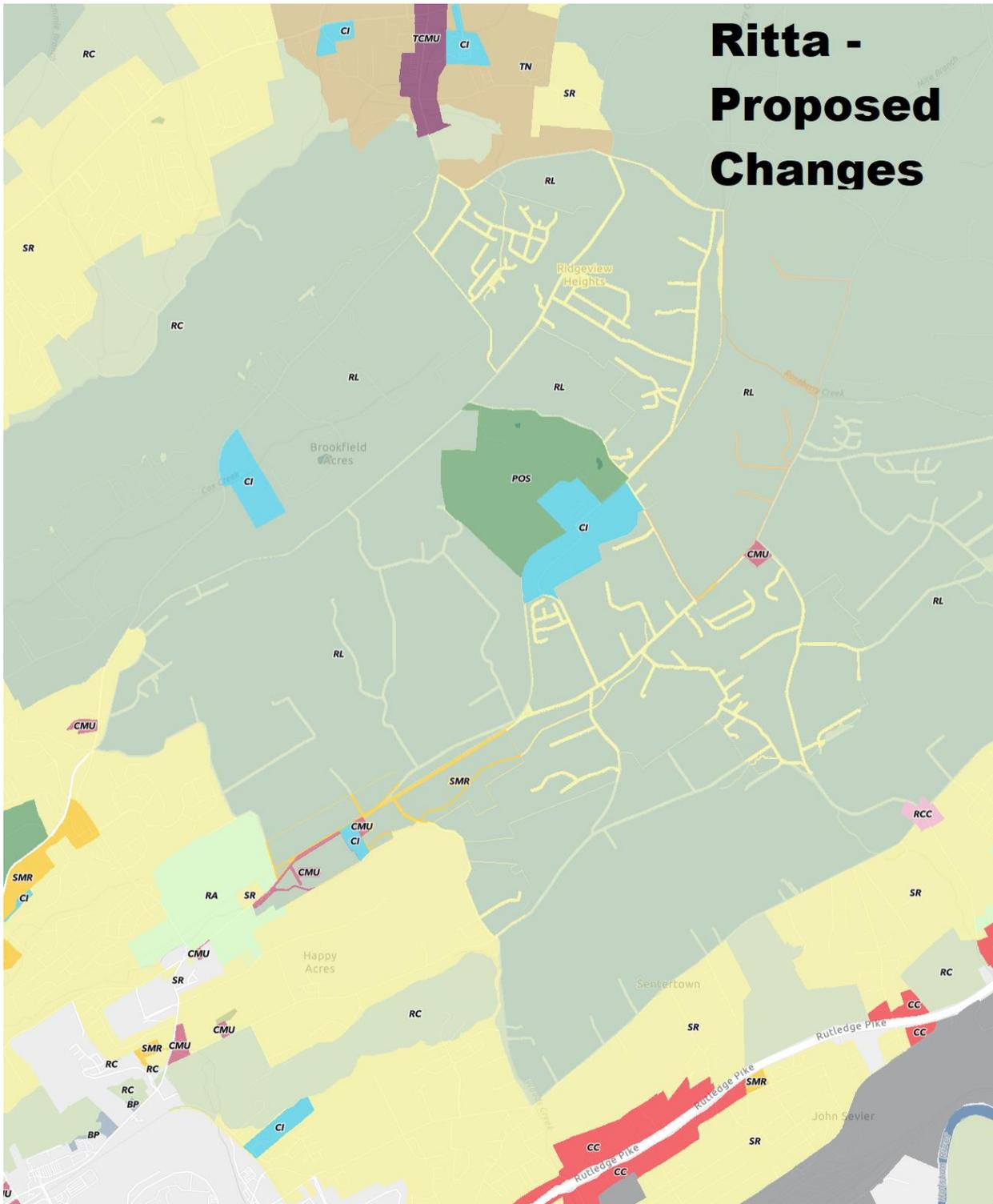
The proposed change would have the Rural Living Place Type used north of Millertown Pike in the expanded Planned Growth Area, and in the remaining Rural Area for consistency.

Why? The Growth Plan Amendment added 4,891 acres of Planned Growth Area to northeast Knox (Washington Pike). All of that area, except 1 parcel that is LDR and a few small RR parcels, has a current sector plan designation of Agricultural.

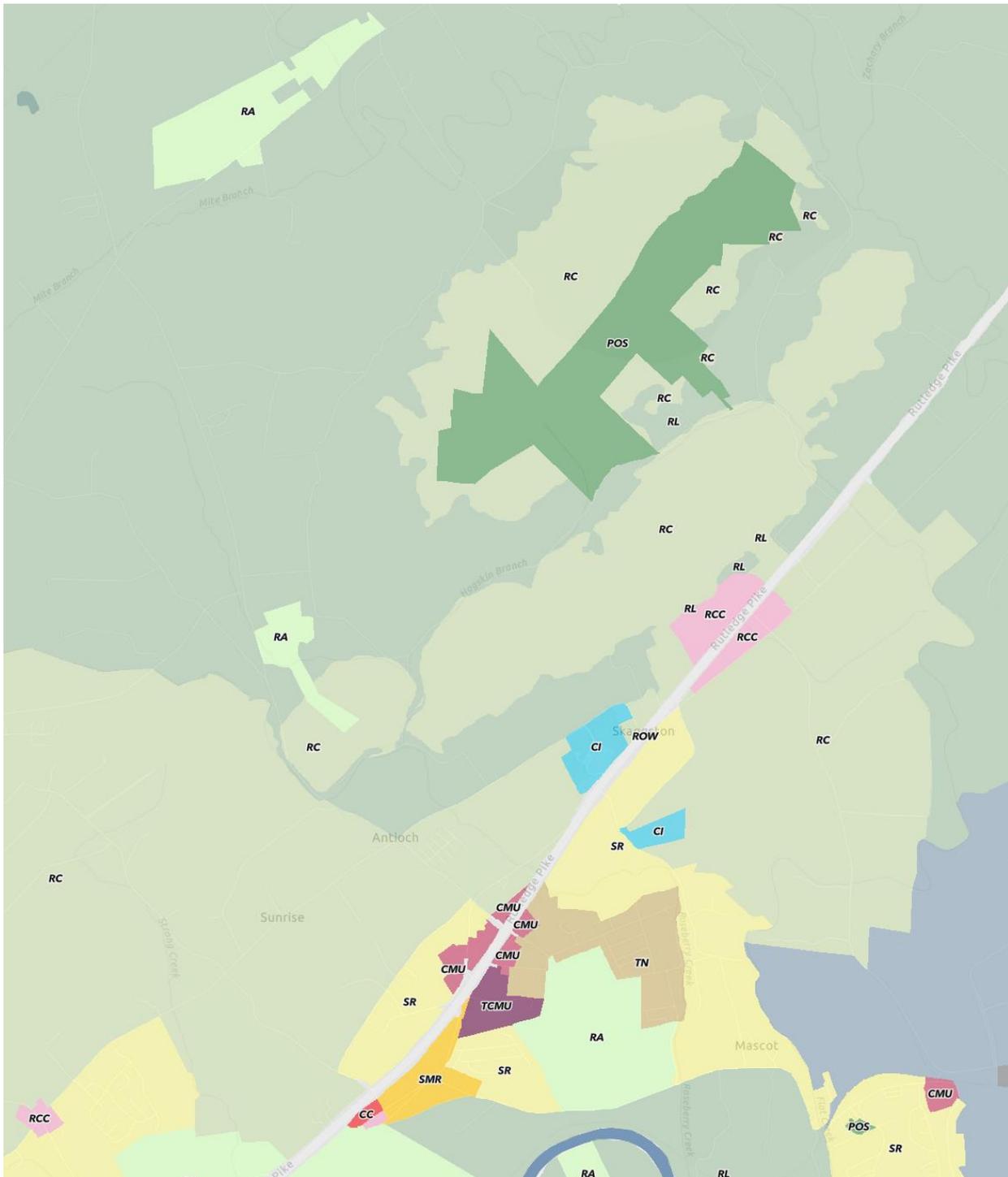
Ritta Area – Current FLUM.



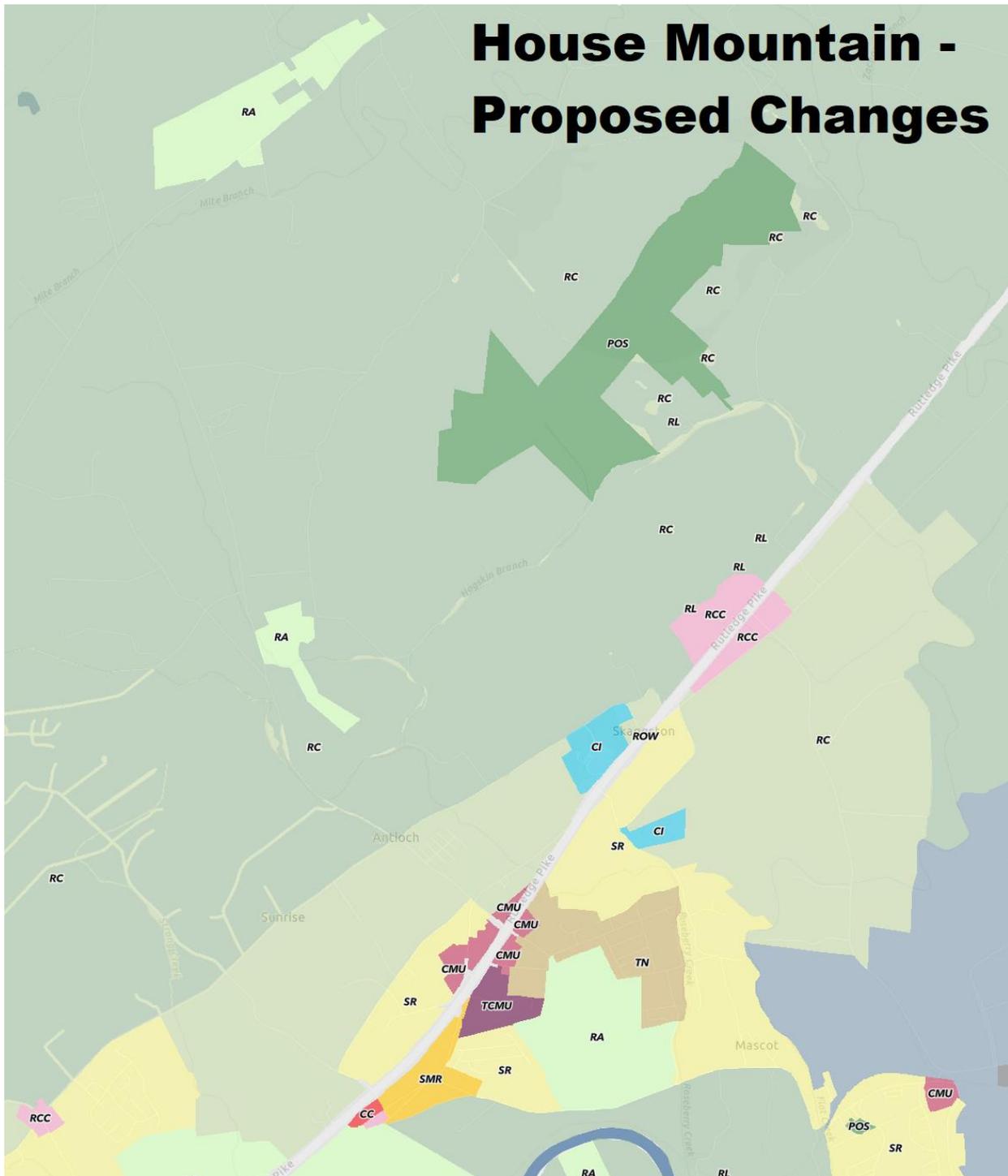
Ritta Area – Proposed Changes. The Suburban Residential, SMR, TN convert to Rural Living.



House Mountain – Current FLUM



The Rural Conservation north of Millertown Pike converts to Rural Living for consistency with the Rural Living on the west and north.



4.