

Re: 10-B-23-A “Missing Middle” Zoning Code amendments

Knox Community Planning Alliance supports a recommendation to approve the proposed zoning text amendments to provide for “Missing Middle” development. The need for this housing is well-known. There is never a single, simple solution to a complex problem. These amendments are one facet of solving the bigger housing shortage.

These amendments can be considered a pilot program that encourages infill development within established mixed residential aka ‘Traditional’ neighborhoods where mixed densities exist.

Why not start on a small scale and see how it goes?

- We urge Planning Commission to set 1-year and 2-year reviews of this plan, in order to make any changes that may arise from unintended consequences. Unlike updating a general plan or the Recode rezoning, which were large policy changes that you want to let play out for a long time horizon, these regulations will produce new/redevelopment that can quickly be observed and judged for how well it fits and works. Planning Commission and City Council should be responsive to feedback and ensure that the regulations are updated if we see any unforeseen consequences.
- The design standards are a critical component to this plan. They guide any new or redevelopment to be generally consistent with the character of our Knoxville neighborhoods. A significant objection to this plan would be permitting development that is modern, zero-setback, and clashes with existing neighborhoods. The design standards are a key component of this plan, and should be emphasized when communicating the plan.
- It is important to provide notice to neighbors so they know of the proposed development and, should administrative variances be considered, the ability to know of the variance and adequate time for the appeal. Neither Section 4.6.G.2 nor Section 15.2 actually explain how this would happen.
- There is confusion regarding the approval process for multiplexes between five and ten units. Table 4-1 ‘RN-4 Development’ requires Special Use approval for multifamily development of 5 or more units on one lot, yet Table 4-3 ‘the Missing Middle’ permits staff level review of multiplex (small) between 5 and 10 units. As multi-family and multiplex are equivalent terms, it appears to be a conflict within the proposed language.
- We strongly encourage providing pre-approved building plans to further encourage “Missing Middle” development.

Thank you for considering our support for this application.

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Knox Community Planning Association