

Questions and Suggestions from KCPA for the new Knox County Comprehensive Plan

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Introduction

Below are some of the concerns we have or have heard expressed when speaking with community members about the Growth Plan and General Plan:

1. How does the General Plan protect farmland soil, natural areas, and other areas? We don't see any requirements - using "shall" words - that require set-asides of prime farmland soil, or that require conservation subdivision designs to be used. Maybe some of that will show up in the UDO, maybe not. But how does this new General Plan protect those areas *before* we put a UDO in place - during this transition period? It was stated in the final Growth Plan Coordinating Committee meeting that these protections would be coming in the next levels – the Comprehensive Plan and the General Plan.
2. How does this proposed General Plan coordinate infrastructure, new parks, new schools, and upgraded services with? In Hardin Valley, we see an extensive expansion of Suburban Residential west of Hardin Valley / Hickory Creek Rd, but we are only just starting to plan for Hardin Valley Rd capacity improvements from Steel Rd to Hickory Rd. And in northeast Knox - there is a new town center shown on the FLUM and a lot of suburban residential, but no new parks on the parks plan, and no transportation projects on the priority list (pages 44-45).
3. How have the criteria for reviewing plan amendments changed? Yes we will look at them once or twice a year, but how have the criteria for reviewing them changed? The work to build this map involved a lot of data and analysis. Could we add criteria, like performing a fiscal analysis and determining it will be net positive? And assessment of whether services and infrastructure are available, or if they aren't, if they are budgeted and within a short time horizon (say 2 years)?
4. Appendix H is a Place Type to Zoning table.
 - a. If a Zone is 'partially related' - the hollow circle - where do we find what the qualifications are for allowing that zone? As an example: If an applicant wants to rezone from Ag to CA under a Corridor Mixed-Use Placetype on say Asheville Highway, where can I find the conditions that could make that appropriate? And when would it *not* be appropriate?
 - b. As another example - let's say we really want the Town Center Mixed Use style of development in an area, like the Carter area. But an applicant comes along and requests Planned Residential - we lose the walkability vision, the mix of commercial, office, and residential, and the shared open space vision - we lose that opportunity. Appendix H says PR is a 'partially related' zone for Town Center Mixed-Use. How do we, as county commissioners, evaluate that request and determine the appropriate qualifications? I don't see any type of policies, or even guidance, on what those should be.
 - c. If an applicant requests a zone that is not related or appropriate, does Appendix H require that it be denied? Or is this just treated as guidance for staff, Planning Commission and County Commission, and we're still going to be dealing with these on a case-by-case basis.

5. What parts of the General Plan are mandatory for the Planning Commission and County Commission to follow? Which parts are just guidance or recommendations?

Example Scenario Illustration of Concerns

Scenario 3

In this scenario, consider a location that has the “Traditional Neighborhood” Placetype located near a key intersection, say the Carter Community. A tract of about 15 acres in size. Located in the PGA.

Request: The land developer requests a land use change from “Traditional Neighborhood” to “Suburban Residential” because they just want to build single family homes on it, and an accompanying rezoning to PR @ 4 du/ac.

Analysis and Decisions: The Growth Plan says all land use types and developments are allowed in the Planned Growth Area and has no additional policies. Therefore, proceed to look at the comprehensive plan and zoning.

Comprehensive Plan: Does not have any guidance on where the Suburban Residential Placetype is located. The applicant states that the property is pretty flat, has minimal topography issues, and would be an excellent location to place a single family residential development and does not have experience building duplexes and triplexes, but is ready and willing to serve the need for single family housing. A planning commissioner notes that the county has very little housing stock and cites that as a reason to approve the FLUM change in the motion to approve, and that some development is better than letting it sit fallow. The Planning Commission votes to recommend a Land Use Map Change.

Zoning: Appendix H says Planned Residential is a directly related zone for the new Suburban Residential Placetype, so the zoning request is appropriate. There are no density guidelines in the Growth Plan. The Appendix H density guidelines for PR include 1-2 and 2-5 du/ac as directly related, so the request is consistent with the Growth Plan and the General Plan. Population is growing in the county generally and there is a need for housing. The Planning Commission votes to approve the requested rezoning to PR & 4 du/ac.

Later, the development plan is submitted. The developer decides to build at 3 du/ac of single family units. There are no sidewalks because internal speed limits are less than 25mph and traffic count is less than 1,000 trips/day. An open space is designated ‘dog park.’ The development plan is consistent with the Suburban Residential placetype and the Zoning Ordinance, and so the development plan is approved.

Result: The development nets 45 units on 15 acres. A Traditional Neighborhood development [should be at least](#) 4 du/ac (and probably more), and would have a mix of housing types and sidewalks, plus small office etc. The results is less units were developed on this land than

recommended by the original FLUM, without sidewalks or walkability. To accommodate those “lost” units, more land is required elsewhere for development. A local land developer starts looking at an active 25 acre farm nearby because there is still unmet housing demand and submits a proposal contingent on rezoning it to PR @ 4 du/ac.

Conclusion: The original designation, Traditional Neighborhood, was an excellent designation. The criteria to amend the Plan allowed it to be easily changed to Suburban Residential, and the Placetypes do not establish minimums for development occurring within them. In the time period until an updated UDO is adopted that has those minimums, developers will seek development regulations that allow them to have the lowest cost possible. More stringent standards for considering a change in plan could help keep the integrity of the well-researched FLUM from being eroded by FLUM change requests.

Observations and Recommendations

The following sections identify 10 different tactics or initiatives that could make a big difference in how effective our new comprehensive plan is at accomplishing its objectives. These tactics and initiatives are ones that we have socialized with community members, and for many of them implementing these turns them from skeptical to enthusiastic supporters.

1. Phasing in the Future Land Use Map

The Advance Knox team has used data to propose a good Future Land Use Map to guide development over the next twenty (20) years. It represents a “Target State” for the county’s development in the ~2045 horizon.

Some areas of proposed development are not ready, from an infrastructure / services / parks standpoint, and funding is not allocated for improving that infrastructure and public services. Many of those areas have been identified as Areas for Future Study – Gibbs, Ritta, Chapman Hwy, Strawberry Plains.

Previously, the Sector Plans were the bridge for this; Sector Plans had a five (5) year planning horizon, and could be incrementally adjusted.

Impact: Expect significant rezoning requests to be applied for in newly changed / expanded areas where there is not yet a plan for providing infrastructure. Appendix H would provide guidance for these new zones as Directly Related or Partially Related, and it is likely rezonings would be approved that the public services and infrastructure are not yet ready to support.

Recommendation: Have two maps a 5-year map and a 20-year target map:

- 1) As an appendix - the 2045 Target Future Land Use Map - this is what we currently have. State that this is used as the guide for future 5-year update cycles.
- 2) Create a 5-Year Future Land Use Map that is the governing map for rezonings and land use, and analyze the map.
- 3) Update the Schedule and Approach for Regular Changes so that the Five-Year update includes an evaluation of updates are appropriate toward 2045 Target Future Land Use based on project pipeline for transportation, services, schools, and parks.

2. Strengthen Place Type Definitions and the Zoning Table (Appendix H)

While extensive data was crunched and extensive professional knowledge of staff and consultants was used to initially locate each of the Placetypes, future requests for amendment may not be supported by the same level of data and expertise. They will be evaluated looking at specific locations with specific uses envisioned for that property.

The current Place Type definitions do not have criteria for where they should and should not be located. Where do we document, for example, what attributes of an area make it more suitable for Suburban Mixed Residential vs. a Traditional Neighborhood? These are criteria that are helpful when we have requests come in for an amendment to the FLUM.

Similar counties in Tennessee have adopted more comprehensive definitions for their Place Types.

- Davidson County has the very extensive [Community Character Manual](#). The [T2 - Rural Character Manual](#) has extensive guidance for zoning and development patterns.
- Hamilton County defines [Place types](#) and suggest densities (see [Ag](#) (0-1 units/acre) and [Suburban Residential](#) (3-10 du/ac)).
- Hamilton County's Area Plans have a "Place Type Assignment Methodology". As an example, the White Oak Mountain Area Plan has examples in [Appendix D](#)

The Place Type definitions do not provide any required ("shall") policies that impose requirements for zones or development plans considered under the Place Type. Appendix H is only guidance for what zoning districts should be considered appropriate under a Place Type; it does not state that the list of zones are all the allowed zones for that Place Type. And for "Partially Related" districts, Appendix H does not provide any criteria that a development plan must implement in order to make that zoning district appropriate.

Osceola County, FL has a Policy in their Comprehensive Land Use Plan that clearly ties the FLUM to the allowed zonings and gives the FLUM and Comprehensive Plan real teeth regarding density:

Osceola County, FL [Policy 1-1.1.4](#): Future Land Use Map (FLUM); Relationship to Zoning Map.

The Future Land Use Map establishes the proposed long-range general use of property for a designated target year. In contrast, the Zoning Map indicates the specific type of land use that the property is currently suited for based on existing conditions. The Zoning Map is subject to continuous amendments so that land, over time, will gradually and systematically be rezoned to be consistent with the planning policies and long-range objectives of the Comprehensive Plan. In determining consistency with the Future Land Use Map, considerations such as land use compatibility, location, availability and

capacity of services and facilities, market demand, and environmental features shall also be used in determining the most appropriate zoning district.

Density may not exceed the parameters allowed by the Future Land Use Element, regardless of zoning. In addition, in making the transition from the Future Land Use Map designation to the most appropriate zoning district classification, it shall be permissible to allow the use of a Planned Development zoning district that provides for fewer uses than permitted with a standard zoning district classification. Furthermore, in making the transition for residential development, the County may impose a more restrictive zoning district classification on a property until such time as the property is found to be suitable and ready for ultimate development.

Impact: Without robust Place Type definitions and policies, the assessment of if a requested Place Type is appropriate will be subjective, and it will erode the predictability of and transparency of the development process.

Recommendations: see Appendix A – Some Suggested Place Type Updates for suggested text to implement specific Place type recommendations.

- 1) Update the section “Implementing the Future Land Use Map” and add a policy similar to the Osceola County Policy 1-1.1.4 that requires properties *shall* only be rezoned to a zoning district category that correlates to the future land use designation for that property and that density cannot exceed the parameters of the Future Land Use Element, and that the County may impose more restrictive zoning district classification on a property until such time as the property is found to be suitable and ready for ultimate development.
- 2) Replace Appendix H with a table that clearly defines the Allowable Zoning Districts, along with maximum allowable densities. [As an example, see the Seminole County Comprehensive Plan [Table of Zoning District Regulations](#)]
- 3) Use “shall” or “must” statements in Place Type definitions. This provides certainty for applicants, staff, and community when rezonings or development plans are submitted; everybody knows what must be in compliance. This better ensures that the Comprehensive Plan is complied with, instead of having individual rezoning decisions be based on what an applicant can convince the Commissions is best. As an example: are sidewalks expected in a Traditional Neighborhood? Probably, so have the Place type use “shall” statements to require them.
- 4) Add a Place Type Assignment Methodology so that plan amendments can reference them to determine if the Place Type is appropriate for a location. This is already in our Land Use Classification tables.
- 5) Add an Agricultural Placetype, driven by soil quality, that is separate from Rural Living. Davidson County, Hamilton County and other comprehensive plans have Agricultural Placetypes; Knox County is an outlier.

3. Strengthen Criteria for Plan Amendments

There is a tension between a desire for predictability of the development process, and a desire for flexibility of amending the plan as individual projects or opportunities arise for a developer.

We want to Work the Plan. For a more predictable processes, we need to strengthen the criteria and process for how plan amendments are evaluated. Otherwise, the substantial public input, professional expertise and data analysis will be eroded by appointed and elected officials who are faced with evaluating plan amendment applications and only have limited information or decision making frameworks to rely on.

How do our peer counties do this?

- **Hamilton County** does not process on-demand amendment applications to its Area Plans with their Placetype Maps. Hamilton County staff notes in their rezoning requests when it is not compatible, and then recommends denial of the rezoning request and suggests an appropriate zone that would be compatible with the existing Place Type. They perform updates of Area Plans on more frequent basis

Nashville / Davidson County has an [extensive manual for how to consider amendments](#) to its Community Plans (which contain their FLUM). It places the burden on the applicant to justify the amendment – the applicant:

“will address how the existing Community Character Policy would restrict the envisioned development, how will the proposed Community Character Policy would benefit the development envisioned, and how the proposed Community Character Policy will maintain, create, or enhance the character of the community”

* Community Character Policies are the equivalent of Place Types or Land Use Classifications

Nashville has two plan amendment categories - Minor and Major. The [application fees](#) are much higher - \$4,350 for a minor amendment and \$91,50 for a Major amendment, vs. Knox County's \$650 for less than 5 acres and \$850 for 5 acres or more. Nashville postcard notification buffers are larger - 600 ft and 1300 ft respectively for minor / major, vs. just 300 ft for Knox County. Also, Nashville often requires the applicant to have community meetings before the amendment is heard. The [application](#) requires the applicant to respond to three questions: 1) Describe how the proposed community plan amendment would be a better fit for the future of the area in question and adjacent areas than the current policy(ies), 2) Summarize the changed conditions that might support changing the community plan as proposed in this application, and 3) Explain why a change to the community plan might be justified at this time.

Hamilton County does not process on-demand amendment applications to its Area Plans with their Placetype Maps. Hamilton County staff notes in their rezoning requests when it is not compatible, and then recommends denial of the rezoning request and suggests an appropriate zone that would be compatible with the existing Place Type. They perform updates of Area

Plans on more frequent basis; as an example the White Oak Area Plan was created in 2019 and is [currently undergoing an update cycle](#).

Williamson County, TN (Franklin, Brentwood, etc) updates its land use plan periodically, and does not do regular updates to its Future Land Use Map except during a major update cycle. The last update cycle was in 2020. Williamson County also does not regularly process zoning map amendments; the zoning stays pretty static. Williamson County uses Special Area Plans to guide development of growth areas (hamlets and villages).

Florida has particularly strong regulations for amending the Future Land Use. [The City of Jacksonville has a clear sheet with criteria](#). Osceola County has a good process [description and chart](#) and may require a community meeting. Seminole County has [very strict requirements](#) for FLUM amendments, with a [significant application packet](#), and application fees from \$3,500 to \$10,000. Included is a [text section](#) where they must describe compatibility to adjacent land uses, changes in character of the surrounding area, and a checklist to demonstrate support and furthering of the policies of the comprehensive plan. The applicant must also complete a [worksheet](#) that documents units/sqft, water demand, sewer demand, solid waste demand, and recreation demand. Seminole County also has clear standards for review, which include [Facility Capacity Impact Assessments](#) for Utilities, School, and Transportation.

Recommendations:

- 1) Strengthen the Criteria for Plan Update to provide how amendments are evaluated and to focus on the FLUM. An example is below:

Future Land Use Map amendments shall be evaluated according to the following criteria:

- A) How the existing Place Type policies would restrict the development,
- B) How the proposed Future Land Use Map amendment would benefit the development envisioned,
- C) How the proposed Place Type will be compatible¹ with the adjacent Future Land Use Map
- D) Demonstrating that the proposed change supports and further the policies, goals, objectives and criteria of the Comprehensive Land Use Plan,
- E) The fiscal and service level impact of the proposed Future Land Use Map amendment on the public facilities, services, utilities and schools,
- F) The impact of the proposed Future Land Use Map amendment on adjacent land uses, and if the proposed Place Type and the associated allowed zonings would mitigate any negative impact on adjacent land uses,
- G) The relationship of the data and information in the application to the social, economic, physical, environment, historical, and agricultural resources of the county and the projections for future growth, including an analysis of the

¹ Compatibility defined - A condition in which land uses can coexist in relative proximity to each other in a stable fashion over time such that no use is unduly negatively impacted directly or indirectly by another use. [Do we have a glossary in our comprehensive plan?]

impact of the proposed change on the amount of land required to accommodate anticipated growth and projected population,

- H) Other professional planning principles, standards, information and more detailed plans and studies considered relevant; and
- I) Written comments, evidence and testimony of the public.

Applications for Future Land Use Map amendments will not be accepted if staff determines one or more of the following:

- a) The suggested amendment would involve an area that will be part of a subarea (community, corridor, neighborhood) planning process in the next two years;
 - b) The suggested amendment has been previously reviewed by the Planning Commission or the County Commission, and circumstances have not substantially changed to support an additional review prior to a 5-year Comprehensive Plan update;
 - c) The application is not sufficiently clear or well-defined to merit further review.
- 2) Strengthen Implementation IM.1 to mandate that plan amendments initiated by individual applicants *shall* be considered on an annual basis, and plan amendments initiated by County Commission resolution or Planning staff may be considered at any time. [current text only states that it is *expected to occur annually*.] Note: this could also provide an avenue for Staff to initiate plan amendments to correct an error, and would put control of that in the hands of the professional expertise of staff instead of individual applicants.
 - 3) Strengthen Implementation IM.2 to mandate “That [plan amendment] process *shall* involve public input as part of the application prior to a public hearing.” This gives Planning staff the authority to require a public meeting for a plan amendment.
 - 4) Add an IM.6 for requiring the applicant to justify the plan amendment - “The applicant for a future land use map amendment shall address how the existing Place Type policies would restrict the development, how the proposed Place Type would benefit the development envisioned, how the proposed Place Type will maintain, create, or enhance the character of the County, and demonstrate that the proposed change supports and further the policies of the Comprehensive Land Use Plan”. [This would facilitate updating the application process, which could be modeled after the [Seminole County worksheets](#) or the [Nashville application](#).]
 - 5) State that government decision makers understand that substantial community participation from a broad range of stakeholders and significant professional analysis went into creating Comprehensive Policy, Future Land Use Map, Policies and guidance.
 - 6) Strengthen the Plan Amendment application - Seminole County has good examples, where the applicant must work with the school system to obtain an estimated impact (thus looping in the school system’s planning group to larger developments), estimates impact to recreation services, and to the water and sewer providers.
 - 7) Consider increasing the fees for plan updates; Knox County is far below the fees of other countries.
 - 8) Add a table for Compatible Transitional Land Uses which can be a good guide. [[Seminole County appendix](#) as an example]

Compatible Transitional Land Uses

This table is to be used as a general guide in evaluating compatibility between proposed and adjacent future land uses designations. A transitional land use is any land use which functions as: (1) a transition through space by a gradual increase in development intensity between land uses (e.g., development of medium density residential between high and low density uses, or a low density development at an urban fringe between an urban area and surrounding general rural areas); and/or (2) transition through time by the conversion of residential uses to higher intensity residential and office uses where the character of an area has changed and the existing use is no longer an appropriate long-term use. Other provisions such as maintaining community character, availability of facilities and services and comprehensive plan policies will also apply to amendment requests.

PROPOSED FUTURE LAND USE	ADJACENT FUTURE LAND USE										
	Rural	Suburban Estates	Low Density	Medium Density	High Density	Office	Commercial	Mixed Development	Light Industrial	General Industrial	Public
Rural *	●	●	●				□				□
Suburban Estates		●	●				□				□
Low Density Residential		●	●	●	□	□	□	□			□
Medium Density Residential			●	●	●	●	□	□	□		□
High Density Residential			□	●	●	●	●	●	□		
Office **			□	●	●	●	●	●	●	□	●
Commercial	□	□	□	□	●	●	●	●	●	●	●
Mixed Development					●	●	●	●			
Industrial - Light				□	□	●	●	●	●	●	●
Industrial - General						□	●	●	●	●	●
Public	□	□	□	□	●	●	●	●	●	●	●

- Compatible Transitional Use
- Can be a compatible transitional use with sensitive site design such as transitioning lot sizes, sufficient buffers, limited building heights, architectural controls and limited hours of operation, limiting adjacent uses to passive, unobtrusive uses (.e.g., no dump sites, loading areas, lighting, noise, odor or hazardous materials). May require a TI, MXD or PD zoning to address these issues. Public use compatibility varies greatly with proposed uses. Because public uses support neighborhoods, these uses are appropriate near residential areas though special buffering may be required.
- * Transitioning of land use (i.e., stepping down of land uses from higher densities to less intense uses) is ineffective in a rural area since it does not clearly identify the future limits of urban development, and will likely lead to urban sprawl. A clear and sharp distinction (e.g., establishment of urban boundaries) between rural and urban densities is considered more effective in protecting rural character.
- ** See Definitions of Future Land Use Designations in the Future Land Use Element for details regarding architectural compatibility.

Figure 1 = Seminole County, FL Table of Compatible Transitional Land Uses

4. Update the Schedule and Approach for Regular Changes

The Updating and Tracking section of the Comprehensive Plan Draft is good for changes other than application-driven Plan Amendments. The only changes recommended are below:

Recommendations (these could be Actions under Policy #9):

- 1) If a phased-FLUM approach is used, where there is a 20-year target FLUM and the current (governing FLUM), then the 5-year update should be a county-wide FLUM re-evaluation and incremental update towards the target-FLUM. The Comprehensive Plan text should note this, call for substantial public input in all sectors of the county (this is one of the Strengths of the Sector Plan process - meetings were local to communities), and call for the update to be made with evaluation of project pipeline for transportation, services, schools, parks, and other public services.
- 2) Strengthen Implementation IM.3 to state that “On an annual basis, the county **shall** review the Comprehensive Plan’s accomplishments and effectiveness...”

5. Strengthen the Actions and Policies for Rural Preservation and Agriculture

Preserving our natural spaces, agriculture, and rural character was one of the resounding themes heard during the community input process. Community members were told during the Growth Plan meetings that protections for those areas, particularly ones located inside the Planned Growth Area, would come at the next levels – the Comprehensive Plan and then the UDO. The Comprehensive Plan is here, and it only provides guidance and recommendations.

Several Planning Commissioners asked about this at the Jan 30th workshop.

Our peer counties have much more restrictive policies and zoning densities for their rural areas. In particular, Williamson County used to have a 1 du/ac minimum. In 2020 Williamson adopted a [new Comprehensive Plan in 2020](#) with the following finding:

Rural zoning districts that allow development to occur at a one unit per one acre density is the common thread that has caused sprawled development patterns, the loss of rural character, increasing traffic congestion, and an increasing burden on public services and facilities.

Williamson County identified their objectives for Rural Preservation (page 14):

- ★ ZONING DENSITIES: Zoning densities outside of Municipal Growth Areas will be one unit per five acres except within designated Hamlets or Village areas with tailored zoning standards pursuant to adopted Special Area Plans.
- ★ RURAL DEVELOPMENT: New development in rural areas will occur in such a way as to preserve open space and natural, scenic, and historic resources and to minimize visual impacts from surrounding properties and road rights-of-ways.
- ★ AGRICULTURE: Agriculture and equestrian uses are encouraged to continue in rural areas, but as such uses are converted to non-agricultural uses, the rural density, character, and sensitive environmental features of the area will be preserved.
- ★ FAMILY FARMS: The county will encourage the continuation of family farms operated by multi-generational families that desire to remain.

Williamson identified the need for a Growth Management Framework (page 32) that established the foundation for the effectiveness of other efforts set forth in its Comprehensive Plan. It called for:

Reduce rural zoning densities. Immediately upon adoption of this plan, reduce the zoning densities outside the Municipal Growth Areas to one unit per five acres, except within designated Hamlets or areas with tailored zoning standards pursuant to adopted Special Area Plans. This will benefit the public by preserving rural character, reducing future traffic within the unincorporated areas, and significantly reducing the cost of providing public services and facilities.

And Williamson County did just that, passing an ordinance several months later to change the density and rezone most of the rural area to their [RP--5 zoning designation](#). [News coverage in this article](#). And [of course there was opposition](#). But Williamson County Commission passed it. They also passed a "[Family Subdivision](#)" ordinance that provides for subdividing some parcels for ownership of immediate family members.

Williamson County is not alone.

- Nashville's Community Character Manual recommends that density for the [T2-RA \(Rural Agricultural\)](#), T2-RCS (Rural Countryside), not exceed 1 du per 5 acres, and even lower density is preferred.
- For Nashville's T2-RM (Rural Maintenance) transect they state that recommend that "Density does not exceed one dwelling unit per two acres and even lower density is preferred to create or preserve an open, rural environment". New development is encouraged to use the [Rural Character Subdivision](#) (Nashville's conservation subdivision)
- In Florida, counties have FLUM policies that strictly specify allowable density. [Seminole County has 3 Rural FLUs](#) of maximum density of 1 du / 10 acres, 5 acres, and 3 acres - nothing that allows it as dense as 1 du/ac.
- Hamilton County has a [Ag placetype](#) with a suggested density of 0-1 du/ac, and a [Countryside Residential placetype](#) recommending 0-2 du/ac.

- For a perspective on the other side of the country, Spokane County, Washington [specifies Land Use densities](#) for Rural Traditional of 1 unit per 10 acres, Rural Residential-5 of 1 unit per 5 acres.

Implication: By not providing mandatory policies for rural preservation, such as reducing the density for Rural Placetypes and implementing rudimentary standards for Conservation Subdivisions, our current Planned Residential low density suburbs will continue to be built until a new UDO is adopted.

Recommendations:

- 1) Create / modify actions under Policy #7 to call for immediately after adoption of the plan, reduce the zoning densities outside the Planned Growth Area to one unit per five acres, with allowances for existing developed parcels that do not meet that density requirement.
- 2) Update the Rural Conservation Placetype to mandate (“shall”) the use of conservation subdivisions, requiring protection of 80% of prime soils in a conservation subdivision and at least 50% set-aside for conservation of the total development area.
- 3) In Appendix H, on the Rural Conservation Placetype Row, change the Planned Residential to be “Partially Related” and add standards for the development that provide basic implementation of Conservation Subdivision principles. This provides a transitional bridge until a full set of Conservation Subdivision regulations have been written.
- 4) In Appendix H, on the Rural Living Placetype Row, change the Planned Residential to be “Partially Related” and add standards for the development that provide basic implementation of Conservation Subdivision principles.
- 5) Create a Family Subdivision provision in the zoning ordinance that allows subdivision of larger lots for immediate family members. [[Wilson County](#), others have examples]
- 6) Create an Agricultural Placetype, and consider if the Rural Living Placetype should be retained, or if a distinct “Rural Conservation” and “Agricultural” Placetypes will be sufficient.
- 7) Strengthen Criteria for Plan Amendments so that the Rural Placetypes will not be easily removed from where they have been applied, i.e. it is difficult to obtain a change from Rural Conservation to Suburban Residential, which could be a common request.
- 8) The plan’s Vision and Goals section has an item for Conservation, but it doesn’t set out objectives for how that should be preserved – what that end state looks like. Some text that could augment that and be placed into the plan is suggested in Appendix B – Additional Policies - Rural Placetypes and Development, and it includes policies that codify some of the Rural Protection.
- 9) For Action 2.1 (update/create transition standards), add text that establishing a clear and sharp distinction between rural and urban densities will be considered more effective in protecting rural character because it helps clearly identify future limits of suburban development.
- 10) Reconsider the FLUM designations around the Midway Business Park. There is land in the Planned Growth Area to the north and west designated Rural Conservation. For the new FLUM to best realize the vision of the East Knox Community Plan, a Rural Living

Placetype or Agriculture Designation would be most fitting, and fits the existing land uses.

6. Add Parcel Layer to the FLUM

It would be very helpful to add the Parcel Layer to the [KGIS Proposed Future Land Use Map](#). Also, it would be helpful to be able to adjust the transparency levels. As an alternative, consider putting the proposed FLUM on the [Planning Cases map](#) which already has the layers and information.

7. Add Soil to the Suitability Analysis

The Suitability Analysis did not include Soil as a layer, particularly examining Prime Farmland Soil.

Recommendations:

- 1) The Soil layer should be added into future analysis, and into the analysis for requests for changes to the Future Land Use Map, with an emphasis on preserving remaining Prime Farmland and Locally Important Soil for agricultural and forestry uses.

8. Identify locations where future Parks and Greenways are located

The Transportation Plan component only includes “strategic greenways”. The Comprehensive Plan acknowledges the existence of the 2009 Park, Recreation and Greenways Plan, and the 2020 Greenway Corridor Study. However, it is unclear what the status of these prior studies is - they are not listed as remaining in effect on page 2. Importantly, the current Sector Plans leverage the 2009 Parks, Recreation and Greenways Plan to identify good locations for new parks and for new greenways, and those maps are used to clue staff and appointed/elected officials into areas they should focus on requesting greenway easements (Action 21.2 and 21.3). A number of greenways that were present in the 2009 study are not listed in Appendix D of the Comprehensive Land Use and Transportation Plan.

Recommendations:

- 1) Add the 2009 Park, Recreation and Greenways Plan and the 2020 Greenway Corridor Study into the list of plans that remain in effect, or on page 21 (Parks) clarify which greenways and parks were dropped from the prior plan and which ones remain (Appendix D has a list of greenways).

- 2) Add a section to address Park Land Acquisition Recommendations for the next 20 years and put these on a map.

9. Mandate the use of recommendations from the Hillside and Ridgetop Protection Plan in unincorporated Knox County

The City has had good experiences using the Hillside and Ridgetop Protection Plan as mandatory language. Action 2.3 is “provide protections for ridges, views and open space”.

Recommendations:

- 1) Codify compliance with the HRPP policies by adding language in the resolution for adoption of the Advance Knox Plan that amends the Hillside and Ridgetop Plan to remove the Briggs amendment that makes it advisory-only. This recommendation helps implement Action 2.3.

10. Additional Actions for supporting Policy #8 - Conserve Historic and Cultural Resources

For historic properties, the zoning ordinance does not provide any benefits to local designation and protection. There are no requirements that adjacent properties be designed in sympathetic ways, or have uses that are compatible and do not impact the historic nature of a resource. There is not a demolition delay process in the County for historic resources, and the penalty for failure to pull a demolition permit is miniscule. The historic resources inventory only has entries that have been identified as listed or identified as Eligible for the National Register; it does not have a category for properties that may be eligible but more research is required, or that are worthy of keeping. To these ends, the actions could be strengthened by:

Recommendations:

- 1) Under Policy #8, add an Action to Create a Demolition Delay Process in Knox County so that demolition permits are delayed up to 90 days to discuss incentives for rehabilitation, salvage opportunities, to document, and pursue other preservation options. Increase the penalties for demolishing a structure without a demolition permit to discourage property owners from bypassing the demolition delay process.
- 2) Under Action 8.4, add the text “Add an additional category of ‘Worthy of Conservation’ to the historic resources inventory that identifies properties are either worth keeping but retention isn’t required, or more research needs to be done to determine if the property may be National Register Eligible” [this text from [Nashville Historic Zoning](#)]
- 3) Add a new Action 8.5 with text “Enhance benefits of local designation by adding performance standards for development plans in all districts that encourage to balance

new development with the existing character, scale, massing, and orientation of nearby historical features.”

11. Appendix A – Some Suggested Place Type Updates

[Hamilton County Placetypes](#) include information for Development Patterns (which include density) as well as Location & Block pattern and other attributes. [Williamson County defines Development Policies](#) for each Land Use Category. Counties in Florida ([Osceola](#), [Seminole](#)) have specific “shall” policies that apply to Land Use categories, defining characteristics such as density, neighborhood characteristics, and specific criteria that may be imposed in order for that FLUM designation to be applied.

We could enhance our Place Type definitions by including additional material. Here are some examples for some selected Place Types:

Traditional Neighborhoods

Traditional Neighborhoods are areas that feature a mix of housing ranging from single family to townhomes and small multifamily buildings. They have a walkable block pattern, a mix of housing types within the neighborhood, and neighborhood amenities such as parks and schools. Small office, commercial, and civic uses may also exist in these areas along major thoroughfares. These areas are typically connected to a mixed-use center.

Land Use Mix

Primary Uses: Residential, Single family Residential, Attached

Secondary Uses: Residential, Multifamily [5-8 units per building, or 9-12 units per building on Collector or Arterial Streets](#); Commercial [such as small retail shops and uses that have little impacts on residential character of the neighborhood \(parking, operating hours, traffic generation, lighting, noise, etc\)](#); Civic

Housing Mix

- Single family on small to medium sized lots
- Attached residential such as duplexes, multiplexes, and townhomes [\(with limited massing of up to 4 units per building\)](#)
- Multifamily buildings [of 2-4 units per building, cottage courts \(maximum 8 units\).](#)

Form Attributes

Building Form

Height: 1-3 stories

Setback: 0-20 feet, generally consistent within a block

Transportation

Primary Mode(s): Walk, Bike

Secondary Mode(s): Automobile

Parking: On-street and private off-street; typically shared and located to the side or rear of buildings

Streets: Blocks are small and walkable with many street connections. Alleys are common.

[Sidewalks shall be required.](#)

Open Space

Compared to suburban neighborhoods, there is more public open space in the form of neighborhood and community parks, pocket parks, and preserved passive open space. Private yards tend to be small and secondary to other open space. Neighborhood schools may serve as open space.

[Development Pattern: Densities can range from a minimum of 4 to a maximum of 18 dwelling units per acre, depending on a variety of factors \(such as infrastructure capacity or proximity to schools or parks\).](#)

[Location: Traditional Neighborhoods are typically in close proximity to stores, schools and other destinations. They may be located on Arterial, Collector, or local streets.](#)

Corridor Mixed-Use

Corridor Mixed-Use areas are appropriate for moderate-scale walkable mixed-use development occurring along major corridors. These areas may incorporate office, retail, civic, residential, and community gathering spaces both vertically and horizontally and should provide connectivity to nearby neighborhoods.

Land Use Mix

Primary Uses: Commercial [such as entertainment, grocery stores](#); Office, [personal services, lodging, medical facilities, small artisanal industry \(such as studios, work spaces, bakeries, breweries, other non-nuisance, low-impact production\)](#)

Secondary Uses: Residential, Multifamily; Residential, Attached; Civic

Housing Mix

- Multifamily buildings [with 20 dwelling units per acre or more](#)
- Attached residential such as duplexes, multiplexes, and townhomes (with limited massing of up to 4 units per building)
- Residential units above ground-floor retail

Form Attributes

Building Form

Height: 2-5 stories

Setback: 20-30 feet, may be greater or lesser, depending on street classification

Transportation

Primary Mode(s): Automobile.

Secondary Mode(s): Walk, Bike.

Parking: Shared surface lots located to the side or rear of buildings, shared parking structures, or on-street parking may be appropriate depending on street classification. [In new developments, parking lots are screened from the street with trees and understory plantings.](#)

Streets: Streets ~~shall should~~ promote a walkable setting with short block lengths [\(300-500 ft\)](#), wide sidewalks ~~with adequate space for,~~ and street trees [and pedestrian lighting](#). [Crosswalks are found at all major intersections.](#)

Open Space

Community and neighborhood parks, pocket parks, plazas, trails, green infrastructure, and public realm (spaces between buildings and the street) act as open space.

[Development Pattern: Densities can range from 20–40 dwelling units per acre, depending on a variety of factors \(such as infrastructure capacity or proximity to schools or parks\). Mixed-use structures abutting existing neighborhoods or lands with residential or rural future land use designations shall include design features on the facades of structures facing those abutting lands that are compatible with and complementary to those residential or rural uses. Special](#)

attention shall be given to established residential uses adjacent to or near any mixed-use parcel or area to provide for a reasonable transition of uses and reasonable buffers. A transitional area of compatible residential uses, structures that resemble residences of comparable heights to the adjacent residential uses, or substantial buffers and setbacks must be provided between the established residential uses and any new nonresidential uses.

Location: Mixed-use corridors are located on Arterial streets. The depth of the Mixed-Use Placetype is determined, in part, by considering the depth of land that can reasonably be designed and developed to be oriented to the corridor.

Town Center Mixed-Use

Town Center Mixed-Use areas are appropriate for large (generally 10-80 acres) and compact walkable developments with employment, commercial, residential, civic, and supporting uses integrated horizontally and vertically with connectivity to surrounding neighborhoods. A close knit arrangement of buildings often frames a central public square or park, or a library or community center may occupy the central square.

Land Use Mix

Primary Uses: Commercial; Office; Multifamily Residential; Public square or park, retail, grocery stores, farmers markets, entertainment facilities, upper floor apartments

Secondary Uses: Attached Residential; Single Family Residential; Civic

Housing Mix

- Multifamily buildings
- Attached residential such as duplexes, multiplexes, and townhomes
- Residential units above ground-floor retail

Form Attributes

Building Form

Height: 2-5 stories

Setback: 0-20 feet

Transportation

Primary Mode(s): Walk, Bike

Secondary Mode(s): Automobile

Parking: On-street, shared structures, or shared surface lots located to the side or rear of buildings.

Streets: Streets shall should promote a walkable setting with short block lengths, wide sidewalks, and street trees.

Open Space

Community and neighborhood parks, pocket parks, plazas, trails, green infrastructure, and public realm (spaces between buildings and the street) act as open space.

Development Pattern: Densities can range from a minimum of 24 up to 60 dwelling units per acre, depending on a variety of factors (such as infrastructure capacity or proximity to schools or parks). Mixed-use structures abutting existing neighborhoods or lands with residential or rural future land use designations shall include design features on the facades of structures facing those abutting lands that are compatible with and complementary to those residential or rural uses. Special attention shall be given to established residential uses adjacent to or near any mixed-use parcel or area to provide for a reasonable transition of uses and reasonable buffers. A transitional area of compatible residential uses, structures that resemble residences of comparable heights to the adjacent residential uses, or substantial buffers and setbacks must be provided between the established residential uses and any new nonresidential uses.

Location: Town Centers are located on Major Arterial streets. The depth of the Mixed-Use Placetype is determined, in part, by considering the depth of land that can reasonably be designed and developed to be oriented to the corridor.

Suburban Residential

Suburban Residential areas are appropriate for primarily single family residential development with lot sizes generally less than one acre. These areas may feature a range of lot sizes and housing size and styles, including some small-scale attached dwellings.

Existing areas exhibit a pattern of curvilinear streets, long blocks, and limited connectivity between neighborhoods and other nonresidential areas. Future developments should feature street and path connections to adjacent neighborhoods, walkable proximity to parks, and bikeable proximity to neighborhood commercial areas.

Land Use Mix

Primary Uses: Single family residential

Secondary Uses: Attached Residential; Civic

Housing Mix

- Predominantly single family subdivisions with lots smaller than one acre
- Attached residential such as duplexes, multiplexes, and townhomes that have the scale of a single family home

Form Attributes

Building Form

Height: 1-2 stories

Setback: ~~1020-2530~~ feet

Transportation

Primary Mode(s): Automobile; residences in this Place Type are generally further from key destinations than those in other Place Types therefore a personal vehicle is needed to reach daily needs and employment.

Secondary Mode(s): Pedestrian and bike connections shall be present if the residential development is within ½ mile of a commercial center, school, park, or major job site.^{n/a}

Parking: On-street and private off-street; individual drives from street. Driveways that directly access collector or arterial streets are minimized to reduce potential traffic conflicts.

Streets: Dead-end streets and cul-de-sacs shall ~~should~~ be limited. Street connections to adjacent residential areas shall ~~should~~ be provided in new subdivisions.

Open Space

Most open space takes the form of private yards. Public neighborhood parks should be located in prominent, easily-accessible locations. Schools could also supplement public parks. Some residential areas include shared access to private open space. [Need a "shall" requirement to provide recreation space if not located within X distance of an existing park]

Development Pattern: Densities can range from minimum of 3 to a maximum of 8 dwelling units per acre, depending on a variety of factors (such as infrastructure capacity or proximity to schools or parks).

Location: Large Suburban Residential subdivisions are accessed from a Major Collector Street or higher, and are not located on environmentally sensitive lands such as hillsides, ridgetops, wetlands, or prime farmland soils.

Rural Conservation

Rural Conservation areas are intended to conserve forested areas, ridges, wetlands, and other significant natural areas by clustering development and minimizing land disturbance. Generally, these areas conserve between 50-70 percent of a site as natural open space.

In growth areas, corridors and pockets of rural conservation indicate places that may be subject to development similar to the adjacent place types, but where more compact and low impact site design is expected.

In rural areas, these places are generally appropriate for residential development in a conservation pattern with lots that are smaller than typical rural lots and are clustered to leave natural areas undeveloped.

Land Use Mix

Primary Uses: Single family (conservation pattern) residential

Secondary Uses: Attached Residential (Conservation Pattern)

Housing Mix

Single family residential subdivisions in a clustered pattern that preserves 50 percent or more open space on a given site

Form Attributes

Building Form

Height: 1-2 stories

Setback: varies

Transportation

Primary Mode(s): Automobile

Secondary Mode(s): n/a

Parking: Private off-street

Streets: Primarily automobile access. Subdivisions have long blocks and meandering streets.

Sidewalks are uncommon

Open Space

Mostly private. Protected through easements or dedication, may be public or private open space. Open space should be designed to connect with any adjacent conservation subdivisions to create larger areas of connected open space. May have trail access.

Development Pattern: New development density shall not exceed one dwelling unit per two acres in the Planned Growth Area, and shall not exceed one dwelling unit per acre in the Rural Area, and shall be through the Conservation Subdivision design with at least 50 percent of the site permanently preserved as open space.

Location: On environmentally sensitive lands such as hillsides, ridgetops, or wetlands; parcels with more than 15% prime or locally important farmland soil where the open space requirements and flexible design will help protect sensitive land or soils.

Rural Living-1

[This is an opportunity to create the transition Placetype that recognizes existing 1 du/ac development]

Rural Living areas are primarily made up of existing small-scale agriculture, open space, and single family residential within a rural setting. These areas may include some limited commercial that supports agriculture and civic uses. A few scattered subdivisions with smaller lots may be found in the area. Countryside Residential may include open fields, woodlands, and streams or lakes, as well as accessory buildings, such as barns and greenhouses.

Land Use Mix

Primary Uses: Agriculture, private open space, or forestry; Single family detached residential
Secondary Uses: Non-commercial farming activities, accessory buildings (barns, greenhouses, etc.); Commercial (small-scale); Civic

Housing Mix

- Single family on a wide range of lot sizes

Form Attributes

Building Form

Height: 1-2 stories

Setback: varies

Transportation

Primary Mode(s): Automobile

Secondary Mode(s): n/a

Parking: Surface lots

Streets: Primarily automobile access. Each lot may have direct access to a corridor

Open Space

Mostly private. Agriculture and undeveloped private land serve as open space. May have trail access

Development Pattern: Existing and new developments shall be a maximum density of up to 1 du/ac on parcels smaller than 5 acres at the time of adoption of this plan. For parcels 5 acres or larger at the time of this plan adoption, new development residential density shall not exceed one dwelling unit per five acres and shall be through the use of a Conservation Subdivision with at least 50 percent of the site permanently preserved as open space.

Location: Located in outer suburban or rural areas. Road network is sparse, and streets are often winding and curvilinear.

Agricultural (A Rural Placetype)

Agricultural Place Types are for the production of crops, the raising of livestock, forestry uses and processes, agricultural service businesses and supporting residences, such as a farmhouse. They are typically large properties (5+ acres) located in rural areas, but smaller ones may be found in suburban, or even urban areas.

Land Use Mix

Primary Uses: Agriculture fields and grazing pastures, equestrian facilities, accessory agriculture-related structures, forestry processes, and agriculture-related businesses (such as boarding stables, riding academies), farm stands, estate homes, single-wide manufactured homes

Secondary Uses: n/a

Housing Mix

Single family on a wide range of lot sizes

Form Attributes

Building Form

Height: Typically 1-2 stories but some accessory structures (i.e. barns, silos) can exceed three stories

Setback: varies

Transportation

Primary Mode(s): Automobile

Secondary Mode(s): n/a

Parking: Surface lots

Streets: Streets are generally paved rural roads without curbs and gutters

Open Space

Mostly private. Agriculture and undeveloped private land serve as open space. May have trail access

Development Pattern: Residential density shall be a maximum of 1 dwelling unit every five acres.

Location: Located in outer suburban or rural areas. Road network is sparse and streets are often winding and curvilinear. Soil quality is an important selection factor for Agricultural Placetypes

Appendix B – Additional Policies

Rural Placetypes and Development

The desired character for rural areas is a continuation of historic rural and agricultural patterns including farms, farm-service businesses, pastureland for horses and other livestock, and low-density residential uses.

Rural residential uses are encouraged to coexist with agricultural uses with compatible character and densities. The gross density of residential development in rural areas shall not exceed one unit per five acres.

Rural tourism uses that are compatible with rural character may be developed with a demonstration that the proposed uses will not negatively impact existing rural or residential uses.

Residents that move into rural areas should not expect an urban or suburban level of service. Rural levels of service will typically not include sanitary sewer.

Stream corridors, woodlands, hillsides, and other valuable natural resources shall be preserved.

Setbacks and buffers shall be required for new development that is adjacent to agricultural, Parks and Open Space, Rural Living, and Rural Conservation Place types.

Limited residential subdivision development in the Rural and Agricultural Placetypes shall be permitted based upon meeting the following criteria:

1. The number of units allowed for a development proposed as 'ranchettes' shall be based upon net density defined as the total number of dwelling units divided by developable land, i.e., land area minus natural water bodies and wetlands.
2. The number of units allowed for a development proposed as a Conservation Subdivision shall be based upon gross density defined as the total number of dwelling units divided by the development's total area.
 - a. At a minimum 50 percent of the land area shall be set aside as conservation, agricultural, or recreational open space.
 - b. Conservation Subdivisions shall optimize the land maintained as open space in order to retain agricultural functions, minimize fragmentation of area resources and/or preserve existing ecological connections. Open space within a Conservation Subdivision will be permanently preserved via easement and managed by the agricultural owner, homeowners association, property owners

association, land trust, conservation organization, public agency, or other ownership and maintenance entity as defined on the plat. The easement or dedication shall remove all residential development rights from the open space, but shall not limit agricultural, conservation, or recreational uses.

Adjacent Historic Structures

Adjacent Historic Structures – New structures shall be designed to provide a transition in scale and massing to adjacent historic structures. A successful transition may be provided by reducing the height and massing of the new structure when approaching a smaller historic structure, and using a building type—such as articulated townhouses near historic structures—to complement the historic structure’s form. Applicants are encouraged to offer additional or alternative innovative ways to provide transition in scale, massing, and building type. In all cases, new structures adjacent to historic structures complement shall in height and massing historic structures and do not threaten the integrity of the historic property and its environment. Signage, lighting, and uses shall not threaten the integrity of adjacent historic property and its environment.